

Commonwealth of Massachusetts  
**DEPARTMENT OF HOUSING &  
COMMUNITY DEVELOPMENT**

Mitt Romney, Governor ♦ Kerry Healey, Lt. Governor ♦ Jane Wallis Gumble, Director

**Commonwealth of Massachusetts**  
**COMMUNITY SERVICES BLOCK GRANT**

**and**

**COMMUNITY FOOD AND NUTRITION PROGRAM**

*Consolidated State Plan and Application*

Fiscal Years 2005 – 2006

Administered by the  
Community Services Unit  
Division of Community Services

Funded by the  
U.S. Department of Health and Human Services

September 2004

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## Attachments

- ❖ Department of Housing & Community Development  
Organizational Structure
- ❖ CAA Directory
- ❖ Notice of DHCD FY 2005-2006 CSBG Public Hearing
- ❖ FY 2004 Community Food and Nutrition  
Program Grant Application
- ❖ CSBG Performance Measure Report

## II. LETTER OF TRANSMITTAL

### 1. Programs Covered by the Plan

The Commonwealth's FY 2005-2006 Community Services Block Grant Consolidated State Plan describes how the Community Services Block Grant (CSBG) program and the Community Food and Nutrition Program (CFNP) operate within Massachusetts. The Plan describes how the state collects and analyzes client information, outcomes, and assists in determining local service delivery, program needs, and priorities.

### 2. Federal Fiscal Years

The State Plan describes how the CSBG and CFNP program will be operated for federal fiscal years 2005 and 2006.

### 3. Designation of Lead Agency to Administer the CSBG Program and Contract Information

In accordance with Section 676(a)(1) of the Community Services Block Grant Act, as amended (P.L. 105-285), the Governor of the Commonwealth of Massachusetts has designated the Department of Housing and Community Development (DHCD) as the lead administering agency of the Community Services Block Grant (CSBG), including the Community Food and Nutrition Program (CFNP). Jane Wallis Gumble, as Director of DHCD, is authorized to sign federal assurances and all other documents pertaining to the CSBG.

The State office to receive the CSBG award notices is:

Jane Wallis Gumble  
Director  
Department of Housing and Community Development  
100 Cambridge Street, Suite 300  
Boston, MA 02114  
Office: (617) 573-1100  
Fax: (617) 573-1460  
E-mail: [Jane.Gumble@state.ma.us](mailto:Jane.Gumble@state.ma.us)

The contact person for the CSBG program issues is:

Theresa Brewer  
Director of Community Services Programs  
Division of Community Services  
Department of Housing and Community Development  
100 Cambridge Street, Suite 300  
Boston, MA 02114  
Office: (617) 573-1400  
Fax: (617) 573-1460  
E-mail: [theresa.brewer@ocd.state.ma.us](mailto:theresa.brewer@ocd.state.ma.us)

Employer Identification Number: 1-046002284-L3

4. Authorizing State Statute

The Massachusetts Economic Opportunity Act of 1984, as amended, M.G.L. c. 23B sec. 24.

**Note:** The Department was formerly known as the Executive Office of Communities and Development.

The Massachusetts State Legislature enacted "The Economic Opportunity Act" for low income citizens of the Commonwealth of Massachusetts.

Consistent with the Community Services Block Grant Act, [Public Law 97-35, Section 672 et seq. as amended 42 USC. Sec. 9901 et seq.], the Commonwealth of Massachusetts Economic Opportunity Act provides:

- A. A definition of terms used for programs operated by the Commonwealth of Massachusetts, e.g., Community Action Agency, Community Services Block Grant, Density of Poverty . . . ;
- B. A description of the requirements for a community action agency Board of Directors and the qualifications which must be met in order for an organization to be recognized as a Community Action Agency;
- C. A description of the contractual relationship between the state and community action agencies, including the Director of the Department, authority to promulgate regulations governing the use of funds, Community Action Agency performance criteria, and the de-designation procedure;
- D. the process by which a Community Action Agency may be designated to serve an unserved area;
- E. A description of how Community Services Block Grant funds will be distributed with ninety percent (90%) for community action agencies, five percent (5%) for discretionary Special Projects, and five percent (5%) for the Department grant administration expenses; and
- F. A description of the Director's authority, subject to appropriation, to disburse additional funds, and for Community Action Agencies to obtain funds other than those distributed by the Director of DHCD.

### III. COVER LETTER FROM GOVERNOR



THE COMMONWEALTH OF MASSACHUSETTS  
EXECUTIVE DEPARTMENT

STATE HOUSE • BOSTON 02133

(617) 725-4000

MITT ROMNEY  
GOVERNOR

KERRY HEALEY  
LIEUTENANT GOVERNOR

August 27, 2004

Clarence Carter, Director  
Office of Community Services  
Administration for Children and Families  
U.S. Department of Health and Human Services  
370 L'Enfant Promenade, S.W.  
Washington, D.C. 20447

Dear Mr. Carter:

In accordance with Section 9908(a)(1) of the Community Services Block Grant Act, as most recently amended (42 U.S.C. Section 9901 et seq.), I hereby designate the Department of Housing and Community Development (DHCD) to act as the lead agency for the administration of the Community Services Block Grant. Jane Wallis Gumble, as the Director of DHCD, is authorized to sign federal assurances and all other documents pertaining to the Community Services Block Grant.

Sincerely,

A handwritten signature in black ink that reads "Mitt Romney".  
Mitt Romney

## **IV. STATUTORY ASSURANCE**

### **Statement of Federal, CSBG, and CFNP Assurances**

As part of the annual or bi-annual application and plan required by Section 676 of the Community Services Block Grant Act as amended, (42 U.S.C. 9901 et seq.) (The Act), the Department of Housing and Community Development acting as the lead agency for the administration of the CSBG hereby agrees to the Assurances in Section 676 of the Act.

#### **A. Programmatic Assurances**

- (1) Funds made available through this grant or allotment will be used:
  - (a) To support activities that are designed to assist low income families and individuals, including families and individuals receiving assistance under part A of title IV of the Social Security Act (42 U.S.C. 601 et seq.), homeless families and individuals, migrant or seasonal farmworkers, and elderly low income individuals and families to enable the families and individuals to:
    - (i) remove obstacles and solve problems that block the achievement of self-sufficiency (including self-sufficiency for families and individuals who are attempting to transition off a State program carried out under part A of title IV of the Social Security Act);
    - (ii) secure and retain meaningful employment;
    - (iii) attain an adequate education, with particular attention toward improving literacy skills of low income families in the communities involved, which may include carrying out family literacy initiatives;
    - (iv) make better use of available income;
    - (v) obtain and maintain adequate housing and a suitable living environment;
    - (vi) obtain emergency assistance through loans, grants, or other means to meet immediate and urgent family and individual needs; and
    - (vii) achieve greater participation in the affairs of the communities involved, including the development of public and private grassroots partnerships with local law enforcement agencies, local housing authorities, private foundations, and other public and private partners to document best practices based on successful grassroots intervention in urban areas, to develop methodologies for widespread replication; and strengthen and improve relationships with local law enforcement agencies, which may include participation in activities such as neighborhood or community policing efforts;
  - (b) To address the needs of youth in low income communities through youth development programs that support the primary role of the family, give priority to

the prevention of youth problems and crime, and promote increased community coordination and collaboration in meeting the needs of youth, and support development and expansion of innovative community-based youth development programs that have demonstrated success in preventing or reducing youth crime, such as programs for the establishment of violence-free zones that would involve youth development and intervention models (such as models involving youth mediation, youth mentoring, life skills training, job creation, and entrepreneurship programs); and after school child care programs; and

- (c) To make more effective use of, and to coordinate with, other programs (including State welfare reform efforts). [’676(b)(1)]
- (2) To describe how the State intends to use discretionary funds made available from the remainder of the grant or allotment described in Section 675C(b) of the Act in accordance with the Community Services Block Grant program, including a description of how the State will support innovative community and neighborhood-based initiatives related to the purposes of the Community Services Block Grant program. [’676(b)(2)]
- (3) To provide information provided by eligible entities in the State, including:
  - (a) a description of the service delivery system, for services provided or coordinated with funds made available through grants made under Section 675C(a) of the Act, targeted to low income individuals and families in communities within the State;
  - (b) a description of how linkages will be developed to fill identified gaps in services, through the provision of information, referrals, case management, and follow-up consultations;
  - (c) a description of how funds made available through grants made under Section 675(a) will be coordinated with other public and private resources; and
  - (d) a description of how local entities will use the funds to support innovative community and neighborhood-based initiatives related to the purposes of the Community Services Block Grant, which may include fatherhood initiatives and other initiatives with the goal of strengthening families and encouraging effective parenting. [’676(b)(3)]
- (4) To ensure that eligible entities in the State will provide, on an emergency basis, for the provision of such supplies and services, nutritious foods, and related services, as may be necessary to counteract conditions of starvation and malnutrition among low income individuals. [’676(b)(4)]
- (5) That the State and the eligible entities in the State will coordinate, and establish linkages between, governmental and other social services programs to assure the effective delivery of such services to low income individuals and to avoid duplication of such services, and State and the eligible entities will coordinate the provision of employment and training activities in the State and in communities with entities



providing activities through statewide and local workforce investment systems under the Workforce Investment Act of 1998. ['676(b)(5)]

- (6) To ensure coordination between antipoverty programs in each community in the State, and ensure, where appropriate, that emergency energy crisis intervention programs under title XXVI (relating to low-income home energy assistance) are conducted in such communities. ['676(b)(6)]
- (7) To permit and cooperate with Federal investigations undertaken in accordance with Section 678D of the Act. ['676(b)(7)]
- (8) That any eligible entity in the State that received funding in the previous fiscal year through a Community Services Block Grant under the Community Services Block Grant program will not have its funding terminated under this subtitle, or reduced below the proportional share of funding the entity received in the previous fiscal year unless, after providing notice and an opportunity for a hearing on the record, the State determines that cause exists for such termination or such reduction, subject to review by the Secretary as provided in Section 678C(b) of the Act. ['676(b)(8)]
- (9) That the State and eligible entities in the State will, to the maximum extent possible, coordinate programs with and form partnerships with other organizations serving low income residents of the communities and members of the groups served by the State, including religious organizations, charitable groups, and community organizations. ['676(b)(9)]
- (10) To require each eligible entity in the State to establish procedures under which a low income individual, community organization, or religious organization, or representative of low income individuals that considers its organization, or low income individuals, to be inadequately represented on the board (or other mechanism) of the eligible entity to petition for adequate representation. ['676(b)(10)]
- (11) To secure from each eligible entity in the State, as a condition to receipt of funding, a community action plan (which shall be submitted to the Secretary, at the request of the Secretary, with the State plan) that includes a community-needs assessment for the community served, which may be coordinated with community-needs assessments conducted for other programs. ['676(b)(11)]
- (12) That the State and all eligible entities in the State will, not later than fiscal year 2001, participate in the Results Oriented Management and Accountability System, another performance measure system for which the Secretary facilitated development pursuant to Section 678E(b) of the Act. ['676(b)(12)]
- (13) To provide information describing how the State will carry out these assurances. ['676(b)(13)] (This is the Narrative CSBG State Plan)

## **B. Administrative Assurances**

The State further agrees to the following, as required under the Act:

- (1) To submit an application to the Secretary containing information and provisions that describe the programs for which assistance is sought under the Community Services Block Grant program prepared in accordance with and containing the information described in Section 676 of the Act. ['675A(b)]
- (2) To use not less than 90 percent of the funds made available to the State by the Secretary under Section 675A or 675B of the Act to make grants to eligible entities for the stated purposes of the Community Services Block Grant program and to make such funds available to eligible entities for obligation during the fiscal year and the succeeding fiscal year, subject to the provisions regarding recapture and redistribution of unobligated funds outlined below. ['675C(a)(1) and (2)]
- (3) In the event that the State elects to recapture and redistribute funds to an eligible entity through a grant made under Section 675C(a)(1) when unobligated funds exceed 20 percent of the amount so distributed to such eligible entity for such fiscal year, the State agrees to redistribute recaptured funds to an eligible entity, or require the original recipient of the funds to redistribute the funds to private, nonprofit organization, located within the community served by the original recipient of the funds, for activities consistent with the purposes of the Community Services Block Grant program. ['675C(a)(3)]\*
- (4) To spend no more than the greater of \$55,000 or 5 percent of its grant received under Section 675A or the State allotment received under Section 675B for administrative expenses, including monitoring activities. ['675C(b)(2)]
- (5) In states with a charity tax credit in effect under state law, the State agrees to comply with the requirements and limitations specified in Section 675(c) regarding use of funds for statewide activities to provide charity tax credits to qualified charities whose predominant activity is the provision of direct services within the United States to individuals and families whose annual incomes generally do not exceed 185 percent of the poverty line in order to prevent or alleviate poverty among such individuals and families. ['675(c)]
- (6) That the lead agency will hold at least one hearing in the State with sufficient time and statewide distribution of notice of such hearing, to provide to the public an opportunity to comment on the proposed use and distribution of funds to be provided through the grant or allotment under Section 675A or '675B for the period covered by the State plan. ['676(a)(2)(B)]
- (7) That the chief executive officer of the State will designate, an appropriate State agency for purposes of carrying out State Community Services Block Grant program activities. ['676(a)(1)]

- (8) To hold at least one legislative hearing every three years in conjunction with the development of the State plan. ['676(a)(3)]
- (9) To make available for the public inspection each plan or revised State plan in such a manner as will facilitate review of and comment on the plan. ['676(e)(2)]
- (10) To conduct the following reviews of eligible entities:
  - (a) full on-site review of each such entity at least once during each three-year period;
  - (b) an on-site review of each newly designated entity immediately after the completion of the first year in which such entity receives funds through the Community Services Block Grant program;
  - (c) follow-up reviews including prompt return visits to eligible entities, and their programs, that fail to meet the goals, standards, and requirements established by the State; and
  - (d) other reviews as appropriate, including reviews of entities with programs that have had other Federal, State or local grants (other than assistance provided under the Community Services Block Grant program) terminated for cause. ['678B(a)]
- (11) In the event that the State determines that an eligible entity fails to comply with the terms of an agreement or the State plan, to provide services under the Community Services Block Grant program or to meet appropriate standards, goals, and other requirements established by the State (including performance objectives), the State will comply with the requirements outlined in Section 678C of the Act, to:
  - (a) inform the entity of the deficiency to be corrected;
  - (b) require the entity to correct the deficiency;
  - (c) offer training and technical assistance as appropriate to help correct the deficiency, and submit to the Secretary a report describing the training and technical assistance offered or stating the reasons for determining that training and technical assistance are not appropriate;
  - (d) at the discretion of the State, offer the eligible entity an opportunity to develop and implement, within 60 days after being informed of the deficiency, a quality improvement plan and to either approve the proposed plan or specify reasons why the proposed plan cannot be approved; and
  - (e) after providing adequate notice and an opportunity for a hearing, initiate proceedings to terminate the designation of or reduce the funding to the eligible entity unless the entity corrects the deficiency. ['678(C)(a)]
- (12) To establish fiscal controls, procedures, audits and inspections, as required under Sections 6781D(a)(1) and 678D(a)(2) of the Act.

- (13) To repay to the United States amounts found not to have been expended in accordance with the Act, or the Secretary may offset such amounts against any other amount to which the State is or may become entitled under the Community Services Block Grant program. ['678D(a)(3)]
- (14) To participate, by October 1, 2001, and ensure that all-eligible entities in the State participate in the Results-Oriented Management and Accountability (ROMA) System ['678E(a)(1)].
- (15) To prepare and submit to the Secretary an annual report on the measured performance of the State and its eligible entities, as described under '678E(a)(2) of the Act.
- (16) To comply with the prohibition against use of Community Services Block Grant funds for the purchase or improvement of land, or the purchase, construction, or permanent improvement (other than low-cost residential weatherization or other energy-related home repairs) of any building or other facility, as described in Section 678F(a) of the Act.
- (17) To ensure that programs assisted by Community Services Block Grant funds shall not be carried out in a manner involving the use of program funds, the provision of services, or the employment or assignment of personnel in a manner supporting or resulting in the identification of such programs with any partisan or nonpartisan political activity or any political activity associated with a candidate, or contending faction or group, in an election for public or party office; any activity to provide voters or prospective voters with transportation to the polls or similar assistance with any such election, or any voter registration activity. ['678F(b)]
- (18) To ensure that no person shall, on the basis of race, color, national origin or sex be excluded from participation in, be denied the benefits of, or be subjected to discrimination under, any program or activity funded in whole or in part with Community Services Block Grant program funds. Any prohibition against discrimination on the basis of age under the Age Discrimination Act of 1975 (42 U.S.C. 6101 et seq.) or with respect to an otherwise qualified individual with a disability as provided in Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 12131 et seq.) shall also apply to any such program or activity. ['678F(c)]
- (19) Section 679. Operational Rule

“(a) Religious Organizations Included as Nongovernmental Providers.---For any program carried out by the Federal Government, or by a State or local government under this subtitle, the government shall consider, on the same basis as other nongovernmental organizations, religious organizations to provide the assistance under the program, so long as the program is implemented in a manner consistent with the Establishment Clause of the first amendment of the Constitution. Neither the Federal Government nor a State or local government receiving funds under this subtitle shall discriminate against an organization that provides assistance under, or applies to

provide assistance under, this subtitle, on the basis that the organization has a religious character.

(b) Religious Character and Independence

1. In General – A religious organization that provides assistance under a program described in subsection (a) shall retain its religious character and control over the definition, development, practice and expression of its religious beliefs.
2. Additional Safeguards – Neither the Federal Government nor a State or a local government shall require a religious organization –
  - a. to alter its form of internal governance, except (for purposes of administration of the community services block grant program) as provided in section 676B; or
  - b. to remove religious art, icons, scripture, or other symbols; in order to be eligible to provide assistance under a program described in subsection (a).
3. Employment practices – A religious organization's exemption provided under section 702 of the Civil Rights Act of 1964 (42 U.S.C. 200e-1) regarding employment practices shall not be affected by its participation in, or receipt of funds from, program described in subsection (a).

(c) Limitations on Use of Funds for Certain Purposes.---

No funds provided directly to a religious organization to provide assistance under any program described in subsection (a) shall be expended for sectarian worship, instruction, or proselytization.

(d) Fiscal Accountability.---

- (1) In General.—Except as provided in paragraph (2), any religious organization providing assistance under any program described in subsection (a) shall be subject to the same regulations as other nongovernmental organizations to account in accord with generally accepted accounting principles for the use of such funds provided under such program.
- (2) Limited Audit.—Such organization shall segregate government funds provided under such program into a separate account. Only the government funds shall be subject to audit by the government.

(e) Treatment of Eligible Entities and Other Intermediate Organizations.—If an eligible entity or other organization (referred to in this subsection as an 'intermediate organization'), acting under a contract, or grant or other agreement, with the Federal

Government or a State or local government, is given the authority under the contract or agreement to select nongovernmental organizations to provide assistance under the programs described in subsection (a), the intermediate organization shall have the same duties under this section as the government.”

### **C. Other Administrative Certifications**

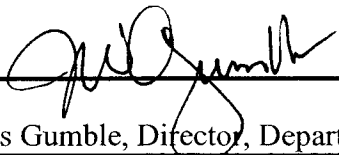
The State also certifies the following:

- (1) To provide assurances that cost and accounting standards of the Office of Management and Budget (OMB Circular A-110 and A-122) shall apply to a recipient of Community Services Block Grant program funds.
- (2) To comply with the requirements of Public Law 103-227, Part C Environmental Tobacco Smoke, also known as the Pro-Children Act of 1994, which requires that smoking not be permitted in any portion of any indoor facility owned or leased or contracted for by an entity and used routinely or regularly for the provision of health, day care, education, or library services to children under the age of 18 if the services are funded by a Federal grant, contract, loan or loan guarantee. The State further agrees that it will require the language of this certification be included in any subawards, which contain provisions for children's services and that all subgrantees shall certify accordingly.

### **D. Statement of CFNP Assurances**

As part of the annual or biannual application and plan required by Section 681 of the Community Services Block Grant Act, as amended, (42 U.S.C. 9901 et seq.) (the Act), the designee of the Chief Executive of the State hereby agrees to provide for community based, local and statewide programs to accomplish the objectives of the Community Food and Nutrition Program (CFNP), as follows:

- (1) To coordinate private and public food assistance resources, where coordination is inadequate, in order to better serve low income populations;
- (2) to assist low income communities to identify potential sponsors of child nutrition programs and to initiate such programs in underserved or unserved areas; and
- (3) to develop innovative approaches to meet the nutrition needs of low-income individuals.

	August 31, 2004
Signature	Date
Jane Wallis Gumble, Director, Department of Housing and Community Development	
Administrator/Director of Designated Lead Agency	

## **V. HEARINGS AND PUBLIC REVIEWS**

### **1. Public Inspection of Plan [42 USC 9908 (e)]**

The Department encourages public participation in the development of services and activities covered by this Plan, including the opportunity to review, and/or submit written comments. The draft plan was available for public inspection in August 2004.

In order to facilitate this requirement, the proposed plan was available on the DHCD website: <http://www.state.ma.us/dhcd/default.htm>.

### **2. Public Hearing [42 USC 9908 (a) (2) (B)]**

The Department provided written notification to CAAs and other appropriate entities announcing the Department's intention to hold a public hearing on the proposed FY 2005-2006 CSBG Consolidated State Plan. Notification of the public hearing's date, time and location was posted on DHCD's website.

A public hearing on the Plan was convened at the DHCD August 16, 2004, 100 Cambridge Street, Boston, MA. Testimony and/or written comments received were considered in the development of the final CSBG Consolidated State Plan.

### **3. Legislative Hearing [42 USC 9908 (a) (3)]**

In 2003, the Massachusetts Joint Legislative Committee on Federal Financial Assistance elected not to hold a Public Hearing at that time but reserved the right to hold future Legislative Hearings. The Legislature continues to review and contribute input in the application process.

## VI. STATE ADMINISTRATIVE STRUCTURE

The Department is the Commonwealth's principal agency for public housing and community development concerns that effect the state's 351 cities and towns. In this role, the Department utilizes state and federal funds and technical assistance available to strengthen communities and help them plan new developments, encourage economic development, revitalize older areas, improve local government management, build and manage public housing, stimulate affordable rental and homeownership through the public/private sector and respond to the needs of low-income people. The Department administers the state's public housing programs, coordinates its anti-poverty efforts, allocates federal community development resources, and provides a variety of services to local government officials.

### Mission

The mission of the Department of Housing and Community Development (DHCD) is to strengthen cities, towns, and neighborhoods to enhance the quality of life of Massachusetts' residents. To accomplish our mission, DHCD will provide leadership, professional assistance, and financial resources to promote safe, decent affordable housing opportunities, economic vitality of communities and sound municipal management. We will forge partnerships with regional and local governments, public agencies, community-based organizations, and the business community to achieve our common goals and objectives. In all of these efforts, we will recognize and respect the diverse needs, circumstances, and characteristics of individuals and communities.

DHCD completed a strategic plan in 2002 that reaffirmed its two overarching priorities:

- promote affordable housing production and preservation, and
- promote healthy communities through community, social and economic development, and planning.

The Department of Housing and Community Development is committed to:

1. programs and funding that target populations of low to moderate incomes and those with special needs;
2. coordinated, integrated and balanced agency responses to address the comprehensive needs and interests of communities;
3. programs and technical assistance designed to facilitate informed decision making at the local level, and to encourage self-sufficiency of residents and communities; and
4. sound business practices that ensure the highest standards of public accountability and responsibility.

### The Director's Office

The Director is a cabinet-level official who is appointed by the Governor to administer and maintain executive authority over all phases of departmental activities and coordinate policy with the Governor and the rest of the Administration. The Director is a member of the Board of Directors



(Vice Chairman) of the MassHousing (formerly the Massachusetts Housing Finance Agency), the Massachusetts Housing Partnership Fund, and the Community Development Finance Corporation. The Director is also a member of the Local Government Advisory Council, and is co-chair of the Commonwealth's Economic Assistance Coordinating Committee. The Director of the Department also serves on numerous other state boards and commission.

The Office of the Director includes the Office of the Chief of Staff and the Communications Office. The Director is also assisted by the Office of the Deputy Director for Policy Development, Office of the Chief Counsel, and Office of Administration and Finance.

The Department is responsible for a variety of programs and services that are administered through three (3) divisions (Division of Community Services, Division of Public Housing and Rental Assistance, and Housing Development) and several commissions, including the Commission of Indian Affairs, the Manufactured Homes Commission, and the American and Canadian/French Cultural Exchange Commission.

In addition, the following quasi-public agencies are affiliates of the Department: MassHousing (formerly Massachusetts Housing Finance Agency); the Community Development Finance Corporation; the Massachusetts Community Economic Development Assistance Corporation and the Massachusetts Housing Partnership.

### **Division of Community Services**

This Division is the conduit through which the Department serves Massachusetts' low-income population. The Division is responsible for planning, implementing, and monitoring the delivery of federal and state anti-poverty, neighborhood economic development, homelessness prevention, fuel assistance, and weatherization programs across the Commonwealth, working in cooperation with the federal government, other state agencies, local and regional nonprofits, and the private sector. The Division of Community Services (DCS) is organized into four (4) components: the Community Services Unit (CSU), the Community Development Unit, the Policy and Planning Unit (PPU) and the Financial and Compliance Unit (FCU).

The Community Services Unit (CSU) administers the Community Services Block Grant, the Community Food and Nutrition Program, the Low Income Home Energy Assistance Program, the Weatherization Assistance Program, the Heating Emergency Assistance Retrofit Task Weatherization Assistance Program (HEARTWAP) and the Neighborhood Housing Services (NHS) program.

The Community Development Unit is responsible for allocating financial and technical resources to assist cities and towns with their revitalization and community development needs. The Unit uses resources such as Community Development Block Grants and other state and federal grants, as well as the technical expertise of staff, to support a wide variety of community and economic development efforts.

Where possible, DCS attempts to integrate the resources of the Community Development Unit and the Community Services Unit.

The Financial and Compliance Unit manages all financial, budgeting, and accounting functions of the Division.

The Policy and Planning Unit administers the CSBG Special Projects program and provides policy comments and recommendations on proposed legislation and statutes analyzing and ensuring consistency among DCS' goals and DHCD's and the Governor's priorities. In addition, PPU provides recommendations for improving program outcome and performance data and program operations.

Under the current threshold and risk-based criteria established for the state's single audit, the CSBG program is not considered a "major program" or a "high risk program". However, as part of the single audit, independent auditors review departmental internal control procedures. Internal control procedures are designed to cover the controls existing for all divisions and programs of the department. Thus, the CSBG-established controls come under the purview of the independent auditor of the state's single audit.

In addition to the state's single audit, DHCD mandates that eligible entities of CSBG funds comply with OMB Circular A-133. Each eligible entity receiving CSBG funds submits a single agency-wide audit performed by an independent auditor in conformance with Circular A-133. These audits are reviewed, and where necessary, a Management Decision letter is issued by DHCD. The Financial and Compliance Unit follows through resolution on any audit findings reported in the single audit.

Furthermore, at least once every year, fiscal staff performs a fiscal on-site monitoring visit to each sub-recipient agency. These on-site visits are in addition to the in-depth fiscal and program assessment review required under the Coats Human Services Reauthorization Act of 1998, Public Law 105-285.

### **Division of Public Housing and Rental Assistance**

This Division is responsible for administrative oversight of state-aided public and private housing programs that address the housing needs of low and moderate-income families, the elderly and persons with disabilities. The Division is comprised of: the Bureau of Federal Rental Assistance, which has responsibility for rental subsidies, upgrading of substandard rental housing, and a wide spectrum of support services tied to a rental subsidy; the Bureau of Massachusetts Rental Assistance, which provides rental subsidies in a flexible way that is more responsive to client choices; the Bureau of Housing Management which oversees the operation and management of 254 local housing authorities and their nearly 50,000 public housing units; the Bureau of Housing Finance which has fiscal oversight of the financial records and capital expenditures of local housing authorities; the Bureau of Housing Development and Construction which has responsibility for the design, development, and construction of new public housing units and the modernization of existing ones.

### **Housing Development**

This Division supports the production of affordable rental housing, including units for persons with special needs, and the construction or rehabilitation of affordable homes and condominiums for purchase by income-eligible first-time homebuyers. Among the programs that are administered by the Housing Development are the Federal Home and Tax Credit programs, Housing Stabilization Fund, HOME, Housing Innovation Fund, Capital Improvement and Preservation Fund, Facilities Consolidation Fund and the Soft Second Program.

### **A. Grant/Contract Management**

Each CSBG-eligible entity receives an Annual Application prior to the beginning of the contract period. The application includes the CSBG National Goals and Outcome Measures, proposed distribution of funds, federal certification, contract documents, including budget and a workplan that links activities to the Community Action Planning documents. These documents detail all requirements that must be met by the eligible entity as a condition of receipt of funding. During fiscal years 2005-2006, CAAs will submit their applications to DHCD by July of each year. Staff will review current activities, establish priorities, and identify training and technical assistance needs. Staff will also assist eligible entities in preparing workplan revisions as needed.

Upon completion of the review and approval process, full execution of contract documents and compliance with all reporting requirements, grantees are eligible to receive funds.

### **Distribution of Funds**

The Department shall award at least 90% of the CSBG funds allocated to the Commonwealth of Massachusetts to eligible entities based on a historical formula. The Department anticipates that the Commonwealth of Massachusetts will receive approximately \$15,924,164 in Community Services Block Grant funding from the U.S Department of Health and Human Services for FY 2005, of which 90%, or \$14,331,748, will be awarded to eligible entities.

In the event that the federal CSBG appropriation for FY 2005 or FY 2006 is less than the amount received by the Commonwealth for the prior fiscal year, the Department will allocate funding to eligible entities based on the distribution formula for FY 2004, or in any other manner which is consistent with the requirements of the Community Services Block Grant Act.

The annual funding and contracting cycle will correspond directly to the timely availability of funds from the U.S Department of Health and Human Services.

The Director, at her discretion, will distribute five percent of the FY 2005 and FY 2006 CSBG funds to non-profits for the following purpose(s):

1. providing training and availability of technical assistance to entities in need;
2. coordinating state-operated programs and services targeted to low-income children and families with services (provided by eligible entities and other funded organizations) to ensure increased access to services provided by such state or local agencies;
3. supporting statewide coordination and communication among eligible entities;
4. analyzing the distribution of funds under the CSBG Act within the state to determine if such funds have been targeted to the areas of greatest need; and
5. supporting innovative programs and activities conducted by community action agencies or other neighborhood-based organizations to eliminate poverty, promote self-sufficiency, and promote community revitalization.

The criteria used to select activities for funding include: 1) diversity in the distribution of resources throughout the Commonwealth of Massachusetts; 2) services to assist special or unserved populations; 3) activities that closely reflect broader policy objectives of the Department; 4) activities that support the implementation of ROMA; and 4) other initiatives that expeditiously respond to the needs of low income people, as determined by the Department.

## **Community Action Planning**

As a condition for funding in accordance with the CSBG Act, in FY 2005 each CAA will develop and implement a three-year Community Action Plan covering fiscal years 2006-2008. CAA's will receive a comprehensive Action Plan Development Guide containing all the information necessary for the development of each CAA's FY 2006-2008 Community Action Plan. The most recent Community Action Plan (FY 2003-2005) included:

- a community needs assessment;
- a description of the service delivery system targeted to low-income families and individuals in the service area;
- a description of how linkages will be developed to fill identified gaps in services through information, referral, case management, and follow-up consultation;
- a description of how funding under the CSBG Act will be coordinated with other public and private resources;
- a description of how a local entity will use the funds to support innovative community and neighborhood-based initiatives related to the purpose of the CSBG which may include fatherhood initiatives and other initiatives with the goal of strengthening family and encouraging effective parenting; and
- a description of outcome measures to be used to monitor success in promoting self-sufficiency, family stability, and community revitalization.

In order to ensure that the plan would meet statutory requirements, DHCD set benchmarks that included specific goals during the planning process. The first component of the Plan, the Action Planning document, described the planning process to be used by CAA. The second component, the needs assessment rationale summary, provided a description of all needs assessment methods and survey instrument(s) that the CAAs utilized during the community needs assessment process. The DHCD evaluation process included a two to three member team review. The DHCD provided extensive technical assistance, both on-site and via the telephone, in the development stage of the plan.

The following chart demonstrates the projected fiscal year 2005 and 2006 CSBG distribution to Massachusetts' CAAs:

<u>Agency</u>	<u>Proportional Share</u>
1. Action for Boston Community Development, Inc.	38.75%

2.	Action, Inc. (Gloucester)	1.86%
3.	Berkshire Community Action Council, Inc. (Pittsfield)	2.55%
4.	Cambridge Economic Opportunity Committee, Inc.	2.83%
5.	Citizens for Citizens, Inc. (Fall River)	3.55%
6.	Community Action Agency of Somerville, Inc.	2.38%
7.	Community Action Committee of Cape Cod & Islands, Inc.	2.32%
8.	Community Action, Inc. (Haverhill)	1.93%
9.	Community Action Programs Inter-City, Inc. (Chelsea)	2.04%
10.	Community Teamwork, Inc. (Lowell)	3.34%
11.	Franklin Community Action Corporation, Inc. (Greenfield)	1.84%
12.	Greater Lawrence Community Action Council, Inc.	2.25%
13.	Hampshire Community Action Commission, Inc. (Northampton)	2.32%
14.	Lynn Economic Opportunity, Inc.	2.90%
15.	Montachusett Opportunity Council, Inc. (Fitchburg)	2.57%
16.	North Shore Community Action Programs, Inc.	2.21%
17.	People Acting in Community Endeavors, Inc. (New Bedford)	3.14%
18.	Quincy Community Action Programs, Inc.	1.84%
19.	Self-Help, Inc. (Brockton)	2.99%
20.	South Middlesex Opportunity Council, Inc. (Framingham)	2.03%
21.	South Shore Community Action Council, Inc. (Plymouth)	1.84%
22.	Springfield Partners for Community Action, Inc.	3.40%
23.	Tri-City Community Action Program, Inc. (Malden)	2.71%
24.	Valley Opportunity Council, Inc. (Holyoke)	2.28%
25.	Worcester Community Action Council, Inc.	4.13%

*FY 2005 and 2006 CSBG funds to be awarded to Community Action Agencies and other eligible entities are subject to availability and receipt of such funds from the U.S Department of Health and Human Services.*

The Department may expend up to five percent (5%) of the Community Services Block Grant allocation for administrative expenses including monitoring activities of the Division of Community Services and the Community Services Unit.

#### **B. Tripartite Board Representation**

Section 676B(2) of Public Law 105-285, the Community Services Block Grant Act, requires that eligible entities receiving Community Services Block Grant funds comply with the stipulation that boards of directors be constituted so that one-third of the members are elected public officials or their representatives, and not fewer than one-third of the members are persons chosen in accordance with the democratic selection procedures adequate to ensure that they are representative

of low income individuals and families in the neighborhood and reside in the neighborhood represented. The remaining one-third represents officials or members of business, industry, labor, faith-based organizations, law enforcement, education, or other major community groups.

1. Petitioning for Adequate Representation, [42 USC 9908 (b)(10)]

Section 29.06 (4) of 760 CMR, Community Services Block Grant regulations require that the by-laws of a CAA or other eligible entity include a description of procedures for selecting new board members in case of a vacancy on the board.

During CSU's in-depth monitoring process, all compliance documents are reviewed to note any inconsistencies with the Community Services Block Grant Act [760 CMR. 29.00] and other applicable federal and state laws.

2. Public CAA Representation Requirements [42 USC 9910(b)]

Massachusetts does not currently have eligible entities that are public organizations.

C. Eligible Entity Designation Process [42 USC 9909]

The Department may designate an eligible entity to serve unserved area(s) in accordance with 676A of the CSBG Act and 760 CMR. 29.04(3).

The existing CAAs in Massachusetts are eligible entities that receive CSBG funding to carry out programs and activities in their designated service areas. If a city or town has not been, or ceases to be served by an existing CAA under the CSBG, the Department may at any time initiate a process for the designation of a CAA or other eligible entity pursuant to provisions of applicable federal and state law, including the CSBG Act and M.G.L. c.23B § 24. 760 CMR 29.04(3)(b) provides the following:

The procedure for existing CAAs or other eligible entities shall be as follows:

1. The Department will notify in writing and request written application from:
  - a. any private nonprofit organization that is geographically located in the unserved area, that is capable of providing a broad range of services designed to eliminate poverty and foster self-sufficiency, and that meets the requirements of the CSBG Act; and
  - b. any private/nonprofit eligible entity that is geographically located in an area contiguous to or within reasonable proximity of the unserved area and that is already providing related services in the unserved area.
2. Requirement. In order to serve as the area's designated eligible entity, an entity described in 760 CMR 29.04(3)(b) 1.b. shall agree to add additional numbers, to the board of the entity to ensure adequate representation:
  - a. in each of the three required categories described in the CSBG Act and 760 CMR 29.06, by individuals who reside in the community comprised by the unserved area; and
  - b. in the category relating to low-income individuals, by members that reside in the neighborhood to be served.

3. Special Consideration. The designation shall be granted to an organization of demonstrated effectiveness in meeting the goals and purposes of the CSBG. Priority may be given to eligible entities that are providing related services in the unserved area, consistent with the needs identified by a community-needs assessment.
4. No Qualified Organization In Or Near Area. If no private, nonprofit organization is identified or determined to be qualified under 760 CMR 29.04(3) to serve the unserved area as an eligible entity, an appropriate political subdivision may be designated to serve as an eligible entity for the area. In order to serve as the eligible entity for that area, the political subdivision shall have a board or other mechanism as required in § 678(b) of the CSBG Act and 760 CMR 29.06.

**D. Monitoring [42 USC 9914]**

The Coats Human Services Reauthorization Act of 1998, Sections 676 and 678B, requires the Department of Housing and Community Development (DHCD) to perform a full onsite review of each Community Action Agency (CAA) at least once during each 3-year period.

The Massachusetts Department of Housing and Community Development has a very comprehensive and in-depth monitoring process in place. The agency has made its monitoring, assessment, oversight, and technical assistance responsibilities high priority items. DHCD program and fiscal staff monitor, assess and review CAAs on an ongoing basis, staying in close communication with agencies, not only to assure compliance and overall health of the organizations, but also supporting them with technical assistance in an array of program and organizational capacity-building areas. DHCD has been working tirelessly with agencies since the Government Performance and Results Act (GPRA) was passed in 1993 to facilitate CAAs, and to some extent, DHCD's transition from service-based to outcome-based organizations using guidelines available mainly due to the implementation of Results-Oriented Management and Accountability (ROMA) Act in 1998. We implemented a comprehensive three-year ROMA training process for our CAAs. In brief, this three-year training process involved:

- An annual application and outcome training for CAA planners.
- Four regional core ROMA training for CAA staff including executive directors.
- On-site review and technical assistance sessions at CAA offices.
- On-site ROMA training for CAA board members.
- Two *Train the Trainer* sessions for CAA and DHCD staff on ROMA training for board members.

Over 200 staff members, including many executive directors from CAAs, completed the ROMA staff training. Board members from all 25 CAAs including many CAA planners as well as DHCD staff have completed this rigorous round of training sessions. Exposure to such a training regimen has certainly positioned DHCD staff to offer and facilitate *real time* technical assistance, particularly in the situations where any delays in intervention could make an at-risk or potentially at-risk agency vulnerable. This office has been pleased with the results attained from our monitoring, training and overall ROMA implementation efforts. Tools and publications developed through DHCD's various ROMA implementation activities have been very productive and are widely used by the CAA network.



The CSU has found that its current monitoring is highly qualified in identifying issues affecting community action agencies. DHCD utilizes a very comprehensive in-depth monitoring and assessment tool. The present tool provides a comprehensive assessment protocol for not only our CSBG programs, but for Community Action as a whole. During the assessment, each CAA's organizational and programmatic capacities are measured and exemplary activities are highlighted in the following areas:

- Board Oversight
- Executive Management
- Fiscal Oversight and Internal Controls
- Human Resource Development
- Program Planning and Implementation
- Management Information Systems
- Outreach

The Community Action Plan (CAP) plays a fundamental role in the monitoring process. In order to determine whether a CAA is meeting the goals of the CSBG Act, CSU observes the links between the goals that CAAs establish in their CAPs to what is stated later in various documents (grant applications, workplans, IS survey, etc.) submitted to DHCD.

The CSU conducts a review and analysis of CSBG-related information in-house throughout the year(s) between the CAP and the on-site monitoring visit. During this review, CSU assesses workplans, board minutes, progress and financial reports, responses to requests for information, and any other relevant information indicative of the organizational and programmatic health of an agency.

Once an on-site visit is scheduled with the CAA, the program representative may request various compliance documents such as bylaws, articles of incorporation, personnel policies, etc. In addition to interviews with key staff (management and program) and board members, monitoring also includes a review of CAA administrative files as well as review of applicable program files.

The in-depth monitoring process combines on-site reviews for CSBG with the Low Income Home Energy Assistance Program (LIHEAP) to the extent possible. The CSU utilizes a team approach in conducting in-depth reviews. CSU management and program staff as well as staff from the Division of Community Services' Financial and Compliance Unit perform in-house pre-assessments and on-site monitoring visits in concordance with the CSBG monitoring system. The CSU is considering a 2-year full site monitoring cycle.

During the years that an on-site monitoring visit does not occur at a CAA, the assigned CSU program representative is required to attend at least one board of director's meeting. After attending a board meeting, a Board Meeting Monitoring Report is completed and sent to the CAA.

DHCD's assessment tool is currently being deployed to conduct our in-house and on-site monitoring of CAAs. Also, a Peer-to-Peer Assessment Tool developed by the Tri-State Network in southern New England (Massachusetts, Connecticut, and Rhode Island) will be utilized to assess and evaluate CAAs in the areas of *Governance, Human Resources, Planning Marketing and Fundraising, Operational Management, Information Technology, Finance and Budget*. A bank of experts from DHCD representing program and fiscal management assisted the Tri-State Network in developing this tool,

which has not been fully implemented yet. Nevertheless, due to the monitoring duties entrusted to us, DHCD will continue to assess its grantee CAAs and offer technical assistance where needed.

### **Corrective Action Plans**

The monitoring system strengthens the possibility for corrective action by increasing the opportunities to identify deficiencies in a CAA's programmatic and/or organizational areas. To the extent possible, DHCD utilizes a proactive approach in identifying and addressing programmatic and organizational deficiencies and provides assistance to agencies in implementing measures to avoid crises and stabilize operations where necessary. However, if it is determined that an agency has failed to deliver services and comply with requirements as provided in the CSBG Act, DHCD will follow procedures under Section 678 C of the Act.

### **Fiscal Monitoring**

The Financial and Compliance Unit (FCU) of the Division of Community Services (DCS) conducts the fiscal monitoring of CAAs on an annual basis. FCU has conducted an annual fiscal review of the CSBG, LIHEAP, WAP and HEARTWAP programs operated by CAAs. The objective of the review is to ensure that all programs are operated in compliance with applicable State and Federal laws, regulations, contracts and budgets and to offer training and technical assistance where necessary. In addition, the FCU requires each CAA to submit an annual agency audit that is reviewed for significant findings.

## **DIVISION OF COMMUNITY SERVICES IN-DEPTH MONITORING ASSESSMENT SCHEDULE**

<b>YEAR 1</b>		<b>YEAR 2</b>	
ABCD	July 2004	FCAC	January 2005
Action, Inc.	August 2004	SSCAC	February 2005
HCAC	August 2004	CTI	March 2005
CAPIC	September 2004	VOC	April 2005
CFC	October 2004	MOC	May 2005
BCAC	November 2004	CACCCI	June 2005
SPCA	December 2004	GLCAC, SMOC	July 2005
		CEOC, NSCAP	August 2005
		CAAS, LEO	September 2005
		PACE, CAI	October 2005
		Tri-CAP, SHI	November 2005
		QCAP, WCAC	December 2005

### **E. Termination or Reduction of Funding [42 USC 9908(b)(8); 42 USC 9915]**

The Department has delineated its termination procedures in Section 29.05 Corrective Action: Termination and Reduction of Funding of 760 CMR 29.00: Massachusetts General Laws c.23B – The Department of Housing and Community Development – Community Services Block Grant Regulations.

Section 29.05 Corrective Action: Termination and Reduction of Funding

- (1) If the Director of the Department determines, on the basis of a final decision in a review pursuant to § 678B of the CSBG Act and 760 CMR 29.09 that an eligible entity fails to comply with the terms of a Department funding agreement, or the Consolidated CSBG State Plan, to provide services under the CSBG Act or to meet appropriate standards, goals, and other requirements established by the State (including performance objectives), the Department shall:
  - a. inform the entity of the deficiency to be corrected;
  - b. require the entity to correct the deficiency;
  - c. offer training and technical assistance, if appropriate, to help correct the deficiency, and prepare and submit to the Secretary a report describing the training and technical assistance offered; or if the Department determines that such training and technical assistance are not appropriate, prepare and submit to the Secretary a report stating the reasons for the determination;
  - d. at the discretion of the Department (taking into account the seriousness of the deficiency and the time required to correct the deficiency), allow the entity to develop and implement, within 60 days after being informed of the deficiency, a quality improvement plan to correct such deficiency within a reasonable period of time, as determined by the Director of the Department; and not later than 30 days after receiving from an eligible entity a proposed quality improvement plan, either approve such proposed plan or specify the reasons why the proposed plan cannot be approved; and
  - e. after providing adequate notice and an opportunity for a hearing, initiate proceedings to terminate the designation of or reduce the funding of the eligible entity unless the entity corrects the deficiency.
- (2) A determination to terminate the designation or reduce the funding of an eligible entity is reviewed by the Director in accordance with the CSBG Act.
- (3) The procedures set forth in 760 CMR 29.05 are intended to be carried out consistent with the protections and procedures provided in the CSBG Act; as it may be amended, and any applicable federal regulations. In the case of a conflict, the federal requirements shall prevail.
- (4) A Community Action Agency (CAA) or other eligible entity will not have its present or future funding terminated and the Department will not de-designate a CAA or other eligible entity until Section 678C of the CSBG Act procedures are followed

and reviewed by the Secretary of the US Department of Health and Human Services is completed pursuant to Section 678C(B) of the CSBG Act. Nor will it have its funding reduced below the proportional share of funding it received the previous fiscal year, except in accordance with the requirements of the CSBG Act.

As part of the monitoring process, the CAA is provided a draft report for review and comment. CAAs are provided information on how well they are meeting the CSBG assurances. The CAA is given a period of time to provide a written response to the monitoring report. Training will be provided in combination with the onsite compliance monitoring. Monitoring of grantee agencies will emphasize the identification of training needs as well as compliance with federal and state regulations. Training will be provided both on-site during monitoring and in follow-up sessions. If further action is needed, the Department will form a Steering Committee comprised of two Department representatives, two Massachusetts Community Action representatives and two grantee representatives. The Steering Committee will convene regular meetings concerning the oversight and status of recommendation tasks.

The Department believes this approach eliminates any interruption of services to communities, and avoids the possibility of negative public perceptions.

## **VII. COMMUNITY SERVICES NETWORK DESCRIPTION [42 USC 9908(b)(3)(A)]**

### **Eligible Entity Characteristics**

There are twenty-five (25) community based nonprofit organizations designated under applicable federal and state law to serve as the Community Action Agencies (CAAs) in the Commonwealth of Massachusetts.

The historical and enabling source of funding for these CAAs is the CSBG Act. Since 1981, Congress and the US Department of Health and Human Services have annually appropriated CSBG funds to the state, which the state in turn distributes to CAAs. With these funds, CAAs develop and coordinate locally generated programs and activities that address the causes of poverty in their respective geographic service area(s). The table on page 28 shows the total number of clients served and the total CSBG and non-CSBG budget of each eligible entity in Massachusetts utilizing the most recent data from the CSBG/IS Survey.

Further information concerning the geographic coverage and name, address, and coverage area for each eligible entity is included in the attached Massachusetts CAA List.

The CSBG program will consist of activities having a measurable and potentially major impact on the causes of poverty in those areas of the community where poverty is a particularly acute problem. Activities designated to assist low income individuals include:

1. securing and retaining meaningful employment;
2. education and literacy program, including computer learning centers;
3. community economic development;
4. budgeting counseling;
5. maintaining adequate housing and a suitable living environment;

6. emergency assistance through loans or grants to meet immediate and urgent individual and family needs, including the need for health services, hunger prevention, housing search, and employment-related assistance;
7. removing obstacles and solving problems which block achievement of self-sufficiency;
8. energy assistance;
9. greater participation in the affairs of the community;
10. counteracting conditions of starvation and malnutrition;
11. transitioning from welfare to work
12. youth and family development, including after-school child care, youth mediation, fatherhood; and,
13. linkages and coordination with other local entities.

The Community Services Unit is responsible for the following major functions:

- ◆ developing the CSBG Consolidated State Plan;
- ◆ preparing federal funding applications and assurances, Community Action Agency funding applications, and formulating funding recommendations;
- ◆ overseeing of the annual contracting process;
- ◆ providing technical assistance and training to Community Action Agency managers and board of directors;
- ◆ monitoring compliance and performance of grantees;
- ◆ enforcing applicable state and federal laws, rules, regulations, statutes, and administrative/policy directives;
- ◆ evaluating CAA strategic corrective action plans; and
- ◆ compiling statistical and qualitative reports.

Prior to the start of each fiscal year, Community Services Unit program representatives and Community Action Agency (CAA) executive directors confer, negotiate, and agree on eligible, measurable workplan objectives, staffing, and allowable program expenses. In addition, DCS Staff visit assigned CAA at least once every three (3) years to conduct performance and compliance monitoring reviews, program evaluations, provide technical assistance, and/or attend board meetings as deemed appropriate by the CSU Director. Monitoring is carried out in accordance with the Community Services Unit CSBG Monitoring Visit Guide.

The Department will support a wide range of services and activities as prescribed in the 2005 - 2006 CSBG Consolidated State Plan within Section IX Planned Use of CSBG Funds. All areas of the state will be provided service programs through direct contracts with eligible entities.

## Eligible Entity Characteristics

Community Action Agencies	Location	Individuals Served*	FY 2005 Projected CSBG Allocation	Non-CSBG Budget**
Action for Boston Community Development, Inc.	Boston	82,847	\$ 5,553,552	\$ 103,459,841
Action, Inc.	Gloucester	5,488	\$ 266,570	\$ 13,509,365
Berkshire Community Action Council, Inc.	Pittsfield	13,287	\$ 365,460	\$ 4,904,768
Community Action Agency of Somerville, Inc.	Somerville	1,152	\$ 341,096	\$ 3,306,577
Community Action Committee of Cape Cod & Islands, Inc.	Hyannis	7,168	\$ 332,496	\$ 6,750,757
Community Action, Inc.	Haverhill	9,433	\$ 276,603	\$ 9,352,429
Community Action Programs, Inter-City, Inc.	Chelsea	11,324	\$ 292,368	\$ 7,681,542
Cambridge Economic Opportunity Council, Inc.	Cambridge	17,936	\$ 405,588	\$ 1,839,714
Citizens for Citizens, Inc.	Fall River	29,900	\$ 508,777	\$ 20,891,713
Community Teamwork, Inc.	Lowell	26,512	\$ 478,681	\$ 47,820,455
Franklin Community Action Corporation	Greenfield	15,586	\$ 263,704	\$ 11,663,819
Greater Lawrence Community Action Council, Inc.	Lawrence	21,089	\$ 322,464	\$ 20,759,716
Hampshire Community Action Commission, Inc.	Northampton	6,090	\$ 332,496	\$ 10,823,354
Lynn Economic Opportunity, Inc.	Lynn	9,874	\$ 415,622	\$ 7,169,791
Montachusett Opportunity Council, Inc.	Fitchburg	28,999	\$ 368,326	\$ 13,818,877
North Shore Community Council, Inc.	Peabody	11,308	\$ 316,731	\$ 4,440,412
People Acting in Community Endeavors, Inc.	New Bedford	27,345	\$ 450,018	\$ 34,325,017
Quincy Community Action Programs, Inc.	Quincy	9,224	\$ 263,704	\$ 17,067,633
Self-Help, Inc.	Avon	23,246	\$ 428,519	\$ 17,152,896
South Middlesex Opportunity Council, Inc.	Frammingham	24,978	\$ 290,935	\$ 46,407,742
Springfield Partners for Community Action, Inc.	Springfield	1,690	\$ 487,279	\$ 2,014,330
South Shore Community Action Council, Inc.	Plymouth	20,489	\$ 263,704	\$ 10,392,177
Tri-City Community Action Program, Inc.	Malden	10,597	\$ 388,390	\$ 6,590,924
Valley Opportunity Council, Inc.	Holyoke	28,050	\$ 326,764	\$ 15,800,603
Worcester Community Action Council, Inc.	Worcester	23,250	\$ 591,901	\$ 11,790,699
TOTAL./Percent		466,862	\$ 14,331,748	\$ 449,735,151

\* Unduplicated number of individuals served and as reported in FY 2003 CSBG IS Survey.

\*\* Total non-CSBG budget as reported in FY 2003 CSBG IS Survey.

## **VIII. RESULTS ORIENTED MANAGEMENT AND ACCOUNTABILITY SYSTEM (ROMA) IMPLEMENTATION [42 USC 9908 (b)(12), 42 USC 9917]**

In 1994, the DHCD began utilizing Massachusetts' discretionary funds to provide CAAs with the opportunity to develop computerized client demographic databases. This competitive grant process continued annually, through fiscal year 1997, until all 25 CAAs had developed the capacity to comply with requirements of the annual CSBG Information System survey. The early focus on building appropriate and flexible computerized client tracking systems that specifically addressed the individual needs of each CAA, placed Massachusetts' CAAs in an excellent position to implement ROMA as soon as it was mandated in 1999. At present, CAAs track and report program outcomes, and many are well on their way to updating their automated client tracking and reporting systems to include the outcome reporting process.

By the beginning of fiscal year 1998, all 25 Massachusetts CAAs developed the capacity to report on the results of their services utilizing the standard ROMA National Goals and Outcome Measures (NG/OMs). DHCD assured this by requiring each CAA to include an Evaluation/Outcome Measures section in their Community Action Plans based on project goals and outcomes. The evaluation section described the NG/OMs selected by each CAA (Goals #1, #3 & #6 were required at minimum), and a plan for measuring outcomes for each of the three planning years. Throughout the year, DHCD staff continued to provide technical assistance to CAAs to facilitate the reporting of NG/OMs in the final CSBG program progress report and the CSBG/IS Survey. In addition, DHCD held ROMA workshops at the MASSCAP Annual Conferences. Furthermore, DHCD continued its efforts to train CAAs in implementing ROMA in FY 1999 through a series of ROMA trainings conducted in conjunction with the state of Connecticut. The National Association for State Community Services Programs conducted two trainings, one in Massachusetts and one in Connecticut, focusing on ROMA basics, such as, outcome reporting, and Scales and Ladders.

During fiscal years 2000 and 2001 DHCD revised its CSBG Administrative and Program Management Assessment (APMA) tool to include, an evaluation of each CAA's MIS and data collection capacity, and an assessment of its senior management and program staff members' understanding of the NG/OMs. The results of this monitoring process were used to determine what additional technical assistance is needed regarding data collection and/or ROMA implementation. Since then, the monitoring and assessment tool has been revised twice to reflect DHCD needs. Representatives from DHCD and the Massachusetts Community Action Association (MASSCAP) met with representatives from the Office of Community Services (OCS), Administration for Children and Families to discuss the status of ROMA implementation in Massachusetts. Although it was recognized that Massachusetts was implementing ROMA successfully, a general concern for OCS was that at that point only 28 percent of the Board of Directors of the 25 Community Action Agencies had participated in formal ROMA training. The need for further ROMA training was agreed upon and became part of Massachusetts' ROMA implementation plan. In response to this need, DHCD applied for and received a \$35,300 Training, Technical Assistance and Capacity Building Program grant from the OCS. Awarded jointly to DHCD and MASSCAP, this grant allowed DHCD to hire the Rensselaerville Institute to implement a training project focusing on the Board of Director's function and capacity building for all 25 Community Action Agency boards. The training was reinforced by an interactive forum on the MASSCAP website that provided on-going ROMA support and training to the Boards.

DHCD met with CAA and MASSCAP representatives, formed an Outcome Management Implementation Project Work Team, and developed a ROMA Vision Statement for Massachusetts to:

- further integrate outcome measurement in all aspects of CSBG planning and reporting;
- use outcome data to influence state policy and implementation;
- demonstrate actual impacts achieved through investments made by DHCD;
- become organizations that lead change and demonstrate community and client impacts;
- build communities that have the resources citizens want and need; and
- support citizens to achieve safe housing, nutritious food, good education, and stable families.

Consultants from the Rensselaerville Institute assisted DHCD and CAA representatives to develop this Vision Statement and presented an outline of a regional ROMA training for Massachusetts CAAs. DHCD hosted a CSBG annual application workshop session for CAA planners and planning department staff that included topics such as: outcome overview and mindset shifts, preparing CSBG Annual Application, and further integration of outcome thinking. The workshop ended with a brief CAA self-assessment on outcome thinking and management. Later during the year, DHCD hosted four 1½ day regional Core ROMA training sessions. Over 200 staff members, including several executive directors attended these sessions. Following the Core ROMA training, each agency prepared performance target outlines for selected programs and presented the outlines to DHCD. The outlines were reviewed by DHCD staff and consultants from the Rensselaerville Institute. During the months of March through May, individual agency training and technical assistance site visits were conducted by a consultant paired with DHCD staff.

During fiscal year 2002, the Director of DHCD authorized the use of CSBG discretionary funds for the creation of a DHCD-CAA E-Government network initiative. By the end of fiscal year 2004, the project achieved three major performance targets:

- i. All 25 Community Action Agencies can now electronically submit their CSBG fiscal, client demographic, and outcome data to DHCD using the new web-based reporting system.
- ii. Staff members at all 25 CAAs are able to compile, analyze, and transfer CSBG data with limited supervision and technical assistance from DHCD.
- iii. DHCD has access, without compromising strict client confidentiality standards, to a statewide CSBG database from which further analyses and snapshot reports can be generated for policy and decision making purposes.

Fiscal year 2002 also marked the beginning of the FY 2003-2005 Community Action Planning process, which was designed to specifically address the requirements of the Coats Reauthorization Act of 1998. The planning process involved, the implementation of a comprehensive community needs assessment, the development of a service delivery system based on the needs assessment results, and the selection of appropriate National Goals and Outcome Measures for each program described in the CAAs service delivery system. One-on-one technical assistance regarding ROMA was made available to all CAAs and on-site visits were conducted as needed.



Prior to the on-site ROMA technical assistance visit, each agency prepared performance target outlines for selected programs and presented the outlines to DHCD. The outlines were reviewed by consultants from The Rensselaerville Institute and DHCD staff and were discussed during the on-site technical assistance visits. DHCD revised the existing CSBG annual application and reporting process so that it is more in line with DHCD's outcome framework and training/technical assistance provided by The Rensselaerville Institute and each CAA's Community Action Plan.

During the upcoming fiscal years 2005-2006, DHCD will continue its on-going effort of ROMA implementation in the following areas:

- Implement a process for CAAs to identify, select, plan, and report on the new National Performance Indicators using DHCD's current planning and reporting avenues, such as, Community Action Planning; Annual Application; Semi-Annual and Annual Program Progress Reporting; and the CSBG Information System Surveys.
- Continue to upgrade and enhance the existing DHCD-CAA E-Government network to allow reporting on the National Performance Indicators.
- Implement an internal CSBG Annual Application review process for DHCD staff.
- Update DHCD's existing Community Action Planning Guide for fiscal year 2006-2008 and complete the planning process for all 25 CAAs by the end of fiscal year 2005.

### **Relevant ROMA Goals and Outcomes**

CAAs in Massachusetts have adopted and have been reporting on the following NG/OMs. Please note that in some instances lettering and description of measures have been changed to correspond with the National Goals and Outcome Measures published in October 1999. Furthermore, DHCD has developed additional outcome measures to standardize the use of "other" outcome measures listed under each National Goal. DHCD will develop and recommend the use of specific outcome measures including the National Performance Indicators for all major CAA programs in Massachusetts during fiscal years 2005-2006.

The following shows the existing National Goals and Outcome Measures and DHCD outcomes:

### **National Goals and Outcome Measures**

#### **GOAL 1: Low-Income People Become More Self-Sufficient**

- A. Number of participants seeking employment that obtain it, as compared with the total number of participants.
- B. Number of participants maintaining employment for a full 12 months.
- C. Number of households in which adults members obtain and maintained employment for at least 90 days.
- D. Number of households with an annual increase in the number of hours of employment.
- E. Number of household experiencing an increase in annual income as a result of earnings.
- F. Number of participating families moving from substandard housing into stable standard housing, as compared with the total number of participating families.

- G. Other outcome measures specific to the work of the CAA.
- H. Number of clients who consider themselves more self-sufficient since participating in services or activities of the agency.
- I. Number of people progressing toward literacy and/or GED.
- J. Number of people making progress toward post-secondary degree or vocational training.
- K. Number of clients reporting an increase in income since participating in the services of the agency.

## **GOAL 2: The Conditions in Which Low-Income People Live Are Improved**

- A. Number of accessible, living wage jobs created and/or retained.
- B. Increase in the availability and affordability of essential services, e.g. transportation, medical care, child care.
- C. Number of households who believe the CAA has improved the conditions in which they live.

## **GOAL 3: Low-Income People Own a Stake in their Community**

- A. Number of households owning or actively participating in the management of their housing.
- B. Amount of "community investment" brought to the community by the Network and targeted to low-income people.
- C. Number of households participating or volunteering in one or more groups.
- D. Number of households who say they feel they are part of the community.

## **GOAL 4: Partnerships among Supporters and Providers of Services to Low-Income People are Achieved**

- A. Number of partnerships established and/or maintained with other public and private entities to mobilize and leverage resources to provide services to low-income people.
- B. Numbers of principal partners who are satisfied with partnership.

## **GOAL 5: Agencies Increase their Capacity to Achieve Results**

- A. Total Dollars mobilized by the agency.
- B. Number of boards making changes as a result of periodic organizational assessment.
- C. Number of programs, which have become more effective as a result of research data.
- D. Number of agencies increasing their number of funding sources and increasing the total value of resources available for services to low-income people.

## **GOAL 6: Low-Income people, Especially Vulnerable Populations, Achieve their Potential by Strengthening Family and Other Supportive Systems**

- A. Number of aged households maintaining an independent living situation.
- B. Number of disabled or medically challenged persons maintaining an independent living situation.
- C. Number of households in crisis whose emergency needs are ameliorated.
- D. Number of participating families moving from homelessness or transitional housing into stable standard housing.

- E. Number of household in which there has been an increase in children's involvement in extracurricular activities.

### DHCD Outcome Measures

Service Category	Programs	DHCD Outcome Measures
Education	Child Care / Day Care	Number of parents able to train for, seek, obtain and/or maintain employment as a result of services.
Housing	Housing Search Homelessness Prevention, etc.	Number of participating families who are near-homeless or at-risk of homelessness who maintain their tenancy as a result of program intervention.
Housing	Housing Search Homelessness Prevention, etc.	Number of families placed in safe, permanent housing who maintain this status for at least six (6) months.
Housing	First time home buying	Number of participants better able to negotiate a first time home purchase through successful completion of a first-time homebuyers program.
Nutrition	Nutrition-related programs, including CFNP	Number of households who have increased access to nutritious food and/or nutrition information and education.
Nutrition	Women Infant & Children	Number of at risk mothers who improve their pre-natal health and/or health of new born and young children through participation in the WIC program.
Depending on program	All programs	Number of households in crisis whose emergency needs are ameliorated. (Can be for emergency food pantry and emergency food distribution programs).
Depending on program	All programs	Number of requests for assistance that result in increased access to resources.
Education	Head Start	Number of children who experience healthy growth and development and whose families are strengthened through participation in Head Start.

## **Fiscal Year 2004 Process and Future Direction**

### **Scales and Ladders**

In response to the national movement to utilize Scales and Ladders as a client assessment and data collection tool, the DHCD began instituting a process for the systematic implementation of Scales and Ladders at the CAA level. An ad-hoc committee of DHCD staff and CAA representatives developed and implemented the Massachusetts Family Self-Sufficiency Scales and Ladders tool for use throughout the CAA network. The tool allows CAAs to assess services using the following self-sufficiency scales:

#### **Employment**

#### **Education**

- Child Education
- Adult Education

#### **Youth and Family Development**

- Child Care
- Family Development

#### **Housing**

#### **Income Management**

#### **Transportation**

#### **Resident Participation**

#### **Nutrition**

To date, DHCD has implemented the following goals:

- Goal 1:** The CSBG Ad-hoc Committee completed the development of the Family Development Scales and Ladders Tool and implementation guidelines.
- Goal 2:** In coordination with CAAs, DHCD implemented a pilot program in two rounds of funding at 11 CAAs.

At present, DHCD is reviewing the implementation of the Scales and Ladders Tool through experience gathered from the 1<sup>st</sup> and 2<sup>nd</sup> pilot phases with a goal to expand the process to all 25 CAAs.

### **Family Credentialing Program**

The DHCD, in cooperation with the Montachusett Opportunity Council, Inc. (MOC – Fitchburg) has developed a *Family Development Training and Credentialing Program*. The program is for frontline workers at CAAs to gain the skills and competencies necessary to further assist families to achieve greater economic and social self-sufficiency. *The Family Development Training and Credentialing Program* is being proposed as a multi-year project: staff training for the first year, and the introduction and utilization of a family scale (e.g., thriving, stable, safe, at-risk, and in-crisis) to measure the progress

of families participating in the program, during the second year. DHCD implemented the following steps:

- Goal 1:** DHCD contracted with the Montachusett Opportunity Council, Inc. (MOC – Fitchburg) to initiate the *Family Development Training and Credentialing Program*.
- Goal 2:** DHCD reviewed the success of staff training on the *family credentialing* based on curriculum developed by Cornell University in New York.

### **CSBG Scholarship Program**

This pilot scholarship program was developed by DHCD in fiscal year 2000 to provide CAA clients with funds (maximum of \$1,000 per client) to pursue a formal higher education. This includes general education, e.g., literacy skills, short term training in occupational skills, or general post-secondary education. Between fiscal years 2002 and 2004, DHCD allocated a total of \$300,000 in Scholarship Program funds to 10 CAAs. Each CAA received a \$10,000 Scholarships grant during each of the three fiscal years. During fiscal year 2003 and 2004, DHCD utilized a new workplan planning and reporting process for Scholarship Project grantees based on three specific self-sufficiency related ROMA outcomes regarding employment, earnings, GED and post-secondary education. DHCD is currently evaluating the CSBG Scholarships Program.

### **Training and Technical Assistance**

In cooperation with The Rensselaerville Institute, DHCD implemented a training process on the topic of ROMA for CAA board members and staff, as well as for DHCD staff. This training offered participants the opportunity to further strengthen their skills in the development of performance-based contracts and management systems. During fiscal year 2003-2004, DHCD completed the following goals:

- Goal 1:** Completed a needs assessment survey of CAA board members and staff, which identified training needs on the topic of ROMA.
- Goal 2:** Completed a statewide Core ROMA training for all 25 CAAs followed by on-site technical assistance at 24 out of 25 CAAs.
- Goal 3:** Completed on-site ROMA training for CAA board members followed by two *Train the Trainer* sessions for CAA and DHCD staff on board ROMA training.
- Goal 4:** Conducted an outcome training for new CSBG staff to better understand DHCD's current and future ROMA implementation process.

During fiscal years 2005-2006, DHCD will develop specific training and technical assistance goals pertaining to the implementation of the new National Performance Indicators and to address corrective actions that emerge from issues identified during its CAA monitoring and assessment process.

## **Information Technology**

Massachusetts now mandates electronic transfer of data between CAAs and DHCD. For the last few years, DHCD has been utilizing software provided by the National Association for State Community Services Programs (NASCS) to compile data from CAAs and to electronically submit its annual CSBG Information System Survey to NASCS. Yet, the reporting process between CAA and DHCD was still being completed on paper and therefore, DHCD had to implement its new DHCD-CAA E-Government Network project. As mentioned elsewhere, the project has been designed to meet the mandates of the ROMA Act of 1998, which calls for collecting and reporting unduplicated CAA client demographic data to the U.S. Department of Health and Human Services. DHCD designed the project specifications with the following two goals in mind: (1) accountability and data verification; and (2) process automation and paperless transactions.

This new process of collecting data from CAAs has greatly improved DHCD's data analysis and reporting capacity; with a hope that future enhancements to this system will further improve reporting and verification of CAA data. DHCD has begun the enhancement process by implementing the following four goals:

- Goal 1:** To allow CAAs to submit their CSBG Annual Application work plan and budget online to DHCD.
- Goal 2:** To further enhance the existing DHCD-CAA E-Government Network project to allow CAAs report on the new National Indicators.
- Goal 3:** To provide CAAs with application training and technical assistance consistent with the existing system and all upgrades and enhancements.
- Goal 4:** To continue to provide in-house training for DHCD staff to be better able to use the new system and all upgrades and enhancements.

During fiscal year 2005-2006, DHCD plans to continue its training and technical assistance process for staff on how to better utilize this new system. One area of training may involve improved use of CAA data for the monitoring, assessment, and technical assistance process. Fiscal year 2005 will also mark the beginning of the transition to a paperless CSBG Annual Application process.

## **IX. PLANNED USE OF CSBG FUNDS**

### **A. Eligible Entities**

1. As described previously, the Department shall award at least 90% of the CSBG funds allocated to the Commonwealth of Massachusetts to the 25 private, non-profit eligible entities. The Department anticipates that the Commonwealth of Massachusetts will receive approximately \$15,924,164 in Community Services Block Grant funding from the US Department of Health and Health Services for FY 2005, of which 90%, (\$14,331,748) will be awarded to eligible entities based on a historical funding formula.

In the event that the federal CSBG appropriation for FY 2005 and FY 2006 is less than the amount received by the Commonwealth for FY 2004, the Department will allocate funding

to eligible entities based on the distribution formula used for FY 2004, or in any other manner which is consistent with the requirements of the Community Services Block Grant Act.

Community Services Block Grant funds that are distributed as grants to eligible entities and have not been expended by an entity may be carried over into the next fiscal year for expenditure by the entity for program purposes.

The annual funding and contracting cycle will correspond directly to the timely availability of funds from the US Department of Health and Human Services.

If less than 100% of the grant or allotment received is distributed to eligible entities as described above, the Director, at her discretion, shall ensure that not more than 5% of the CSBG funds is budgeted for the following purposes:

1. providing training and technical assistance to entities in need of such training and assistance;
2. coordinating state-operated programs and services targeted to low income children and families with services (provided by eligible entities and other funded organization) to ensure increased access to services provided by such state or local agencies;
3. supporting statewide coordination and communication among eligible entities;
4. analyzing the distribution of funds under the CSBG Act within the state to determine if such funds have been targeted to the areas of greatest need; and
5. supporting innovative programs and activities conducted by community action agencies or other neighborhood based organizations to eliminate poverty, promote self-sufficiency, and promote community revitalization.

The criteria used to select activities for funding include: 1) diversity in the distribution of resources throughout the Commonwealth of Massachusetts; 2) services to assist special or unserved populations; 3) activities that closely reflect broader policy objectives of the Department; and 4) other initiatives that expeditiously respond to the needs of low income people, as determined by the Department.

2. The following list shows all CSBG funded programs within applicable program categories on a statewide basis. The information was gathered from the fiscal year 2003 CSBG/IS Survey.

The Community Services Unit, during the fiscal year 2005-2006, will encourage CAAs to increase the total number of programs implemented under Self-Sufficiency, Economic Development, Income Maintenance, Senior, Youth and Resident Participation categories. This strategy will help CAAs address poverty using a holistic approach.

Programs Supported by CSBG Funds: Fiscal Year 2003 - 2004

SERVICE CATEGORIES	Number of CAAs reporting (n=25)	% of CSBG allocated	Sample Programs
SELF-SUFFICIENCY	14	4%	Family Self-sufficiency case management/individual self-sufficiency programs.
EMPLOYMENT	10	8%	Adult Work Experience; Head Start Staff OJT; Information and Referral; job/career counseling; skills training programs; staff training and development for CAA employees; summer youth jobs programs; and youth work experience program.
ECONOMIC DEVELOPMENT	5	2%	Community economic development projects.
EDUCATION/LITERACY	16	8%	Adult Basic Education/GED; educational counseling and guidance; ESL instructions; and Information and Referral.
INCOME MANAGEMENT	9	2%	Budget/credit/financial counseling; consumer education and protection; Income Tax counseling; and Information and Referral.
HOUSING ASSISTANCE	20	11%	1 <sup>st</sup> time homebuyers/homeownership counseling; affordable housing preservation, housing search and placement and landlord/tenant advocacy.
NUTRITION	16	5%	Community Food and Nutrition Program; food banks and food pantries; nutrition education and counseling; SHARE program; Summer Feeding programs; surplus food/commodities distribution; WIC; and holiday food program.
HEALTH	17	4%	Alcohol and drug abuse prevention; family planning services; primary health care; transportation to medical appointments; substance abuse treatment.
EMERGENCY ASSISTANCE	19	7%	Crisis intervention and counseling; donated goods; homelessness



ENERGY ASSISTANCE	17	7%	prevention; emergency cash assistance; FEMA; emergency transportation. Fuel Assistance; Weatherization Assistance Program; HEARTWAP; private utility assistance.
YOUTH & FAMILY DEVELOPMENT	21	11%	Summer youth games; youth recreation projects; summer youth employment; school drop out prevention; homework assistance; Head Start; child care; and day care programs.
SENIOR	9	2%	Projects specifically designed to address the needs of elderly people, such as meals, transportation, telephone assurance, foster grandparents support, inter-generational programs.
RESIDENT PARTICIPATION	8	3%	Community organizing; community advocacy; community needs assessments; and general outreach.
LINKAGES AND COORDINATION	20	17%	Toy Giveaway; transportation; community-wide board participation; coalition and partnership building, and Intra and Inter agency planning.
OTHER	14	9%	Organizational development and capacity building, board and staff training, planning and information technology.

**Source:** Fiscal years 2003 and 2004 CSBG contract and IS Survey data.

**B. State Use of Retained/Discretionary Funds [42 USC 9908(B)(2)]**

**CSBG Special Projects**

During fiscal years 2003 through 2004, DHCD identified several priority categories in which CSBG Special Projects funding was to be directed. DHCD seeks to prioritize funding for projects involving:

- Economic self-sufficiency
- Affordable housing and homelessness prevention efforts
- Indicators research
- Increased collaboration and partnerships between CBOs and CAAs, and CBOs and municipal government entities.

The Director, at her discretion, may also provide financial and technical assistance grants to support a variety of anti-poverty and economic development activities that promote family self-sufficiency. As a matter of course, discretionary funds have been awarded to CAAs, as well as other community based nonprofit agencies, for start-up projects rather than multi-year funding.

Community Services Block Grant Special Projects awards for FY 2005 and 2006 will be announced as the Department approves them.

The Department of Housing and Community Development (DHCD) is mandated to spend not more than five percent (5%) of the total CSBG allocation on projects and programs at the local levels at the discretion of the Director of DHCD.

During fiscal year 2004, DHCD's CSBG discretionary allocation from the U.S. Department of Health and Human Services was \$796,206. Using fiscal year 2003 allocation and prior year's unexpended funds, DHCD committed a total of \$857,699 in grants, primarily to community action agencies. The following is a list of grants and their intended purposes:

- ❖ Action for Boston Community Development, Inc. (Boston) received a \$10,000 grant to continue their CSBG Scholarships Program during fiscal year 2004.
- ❖ Action, Inc. (Gloucester) received a \$10,000 grant to continue their CSBG Scholarships Program during fiscal year 2004.
- ❖ Commonwealth Tenant Association (Boston) received an earmark grant of \$25,000 for their Computer Technology Center project.
- ❖ Community Action Agency Somerville, Inc. (Somerville) received a \$10,000 grant to continue their CSBG Scholarship Program during fiscal year 2004.
- ❖ Community Action Programs, Inter-City, Inc. (Chelsea) received a \$20,000 housing assistance grant to provide housing search and placement services, primarily for elderly residents.

- ❖ Community Teamwork, Inc. (Lowell) received a \$47,280 grant to offer employment suitability training and assistance for low-income women.
- ❖ Community Economic Development and Assistance Corporation (Boston) received a \$30,000 grant to continue their workforce development project.
- ❖ Franklin Community Action Corporation, Inc. (Greenfield) received a \$10,000 grant to continue their CSBG Scholarships Program in fiscal year 2004.
- ❖ Hampshire Community Action Commission, Inc. (HCAC) received a \$10,000 grant to continue their CSBG Scholarships Program in fiscal year 2004.
- ❖ Hungry Hill CDC (Springfield) received a \$100,000 earmark grant to develop and implement a housing rehabilitation program for low and moderate income residents.
- ❖ Jackson Mann Community Center (Boston) received a \$25,000 grant to operate a Computer Technology Center.
- ❖ The Massachusetts Association for Community Development Corporation (Boston) received a \$50,000 grant for their Minority Fellows and CDC capacity building program.
- ❖ The Massachusetts Community Action Association, Inc. (statewide) received a \$5,000 administrative support grant.
- ❖ Methuen Arlington Neighborhood Association (Methuen) received a \$20,000 earmark grant for their neighborhood development project.
- ❖ Montachusett Opportunity Council, Inc. (Fitchburg) received a \$40,000 grant to establish and operate Individual Development Accounts for low-income residents. This grant was implemented in collaboration with other area CAAs.
- ❖ People Acting in Community Endeavors, Inc. (New Bedford) received a \$10,000 grant to continue their CSBG Scholarships Project in fiscal year 2004.
- ❖ Quincy Community Action Programs, Inc. (Quincy) received a \$10,000 grant to continue their CSBG Scholarships Project in fiscal year 2004.
- ❖ The Rensselaerville Institute, a training and technical assistance organization from New York received a \$65,000 grant to assist the Division of Community Services with its outcome-based management and Governor's priority projects.
- ❖ Solutions CDC (Holyoke) received a \$37,419 grant for their youth and economic development project.
- ❖ South Middlesex Opportunity Council, Inc. (Framingham) received a \$10,000 grant to continue the CSBG Scholarships Program in fiscal year 2004.

- ❖ Springfield Partners for Community Action, Inc. (Springfield) received two grants. A \$20,000 grant to offer income tax counseling and financial training and a \$10,000 CSBG Scholarship Program grant.
- ❖ Tri-City Community Action Program, Inc. (Malden) received a \$10,000 grant to continue the CSBG Scholarship Project in fiscal year 2004.
- ❖ Valley Opportunity Council, Inc. (Holyoke) received a \$15,000 grant to operate a Youth Food Café for low-income youth and children.
- ❖ Watertown Community Housing (Watertown) received a \$38,000 grant to implement a comprehensive planning and housing development project.

The remaining CSBG discretionary funds were obligated for the purpose of providing emergency housing cash assistance to LIHEAP clients, community indicators, and rural development projects.

### **Fiscal Year 2003**

During fiscal year 2003, DHCD allocated a total of \$803,470 in grants, primarily to Community Action Agencies. Grants were provided for the following purposes:

Subgrantees	Award Amount	Program/Project
Action for Boston Community Development, Inc.	\$ 10,000.00	Scholarship Program
Action, Inc.	\$ 10,000.00	Scholarship Program
Action, Inc.	\$ 10,000.00	ESL project
Community Action Agency of Somerville, Inc.	\$ 10,000.00	Scholarship Program
Community Action, Inc.	\$ 17,000.00	Strategic Planning
Community Teamwork, Inc.	\$ 50,000.00	Regional Housing Corp.
Franklin Community Action Corp.	\$ 10,000.00	Scholarship Program
Greater Holyoke CDC/Solutions CDC	\$ 10,000.00	Neighborhood Justice/EP
Housing Assistance Corp.	\$ 15,000.00	Cape Cod Real Estate Pr.
Hampshire Community Action Council	\$ 10,000.00	Scholarship Program
Massachusetts Community Action Association	\$ 79,000.00	Mgmt. Roundtable/Workforce
Mass. Association for CDCs	\$ 10,000.00	CDC Capacity Building
Montachusett Opportunity Council, Inc.	\$ 9,000.00	Youth Tutoring Program
Montachusett Opportunity Council, Inc.	\$ 9,350.00	Family Credentialing
North County CDC	\$ 40,000.00	CDC Capacity Building
People Acting in Community Endeavors, Inc.	\$ 10,000.00	Scholarship Program
Quincy Community Action Programs, Inc.	\$ 10,000.00	Scholarship Program
Rensselaerville Institute	\$ 10,000.00	CAA capacity building
Rensselaerville Institute	\$ 92,725.00	Training & Technical Asst.
South Middlesex Opportunity Council, Inc.	\$ 10,000.00	Scholarship Program
Springfield Partners for Community Action, Inc.	\$ 10,000.00	Scholarship Program
Springfield Partners for Community Action, Inc.	\$ 75,000.00	Basketball Hall of Fame
Tri-City Community Action Programs, Inc.	\$ 10,000.00	Scholarship Program

The remaining discretionary funds were allocated for the purpose of providing emergency housing assistance to LIHEAP clients and toward community development projects.

## **ADMINISTRATIVE FUNDS**

The Department may expend up to five percent (5%) of the Community Services Block Grant allocation for administrative expenses and grant management monitoring activities of the Division of Community Services and the Community Services Unit.

About seventy percent (70%) of the administrative funds will be earmarked for staff salaries and associated fringe benefits. The remaining thirty percent (30%) will be used for other direct administrative expenditures such as office supplies, travel, conferences, and state overhead costs.

## **X. COORDINATION AND LEVERAGING OF OTHER FUNDING AT STATE LEVEL [42 USC 9908 (b)(5), 42 USC 9908 (b)(6), 42 USC 9908 (b)(9)]**

1. The CSU ensures coordination, linkage and partnership between the CSBG program and other entities by active participation on numerous boards, including, but not limited to the State Mental Health Planning Council, and Commonwealth Coordinating Committee to Support Families, Schools and Community Collaboration. DHCD is also seated on the three regional boards of the Emergency Food and Shelter Program operated by the United Way. In addition, DHCD has a sound relationship with Massachusetts Association for Community Action (MASSCAP), the State Association representing CSBG grantees. Meetings are often coordinated between MASSCAP and various DHCD representatives so that information may be shared concerning a variety of issues concerning low-income individuals.
2. The Department of Labor and Workforce Development (DLWD) was designated by former Governor Cellucci as the agency responsible for implementing the Workforce Investment Act (WIA). To assure collaboration by the many partnering agencies included in the Act, in the fall of 1998 DLWD convened a group of state workforce development agencies to begin discussions focused on implementing WIA in Massachusetts. Although DHCD did not actively participate in the development of the Massachusetts Unified State Plan, DHCD reviewed the draft plan and met on a number of occasions with representatives of DLWD. DHCD also met with MASSCAP to discuss their ongoing role in participating on a number of the nine sub-committees created to address a range of issues effecting the implementation of WIA. Also, former Governor Cellucci appointed a MASSCAP representative to the State Workforce Investment Board. Massachusetts is integrating and coordinating its workforce development system. In Massachusetts - and nationally - the limited engagement between Community Action Agencies and state and regional workforce development systems represents a major lost opportunity in the creation of an effective self-sufficiency continuum. While many Community Action Agencies across the country provide leading-edge programs in worker education and training, in too many localities the CAA network is not systematically or fully integrated with the institutions and services established through the Federal Workforce Investment Act. In some respects, the relationship between these entities mirrors the larger obstacles and opportunities nationally. DHCD is requesting the support of DHHS in the amount of \$34,125 to underwrite the development of training and technical assistance information to strengthen the Self-Sufficiency Continuum. To

successfully develop this training and technical assistance information, DHCD has partnered with the Massachusetts Association for Community Action (MASSCAP) and the Commonwealth Corporation (CommCorp). In addition, DHCD has solicited and received the endorsement for this project from numerous community, workforce, and economic development agencies. DHCD and its partners have designed the proposed project so that (1) it will reinforce the strategic role CAA agencies and other community-based organizations within the workforce development system play, (2) define the role the entrepreneurial training and minority small business could play in strengthening the continuum, and (3) strengthen agencies' self-sufficiency measuring and reporting systems. DHCD will continue to work with DLWD to ensure greater participation and coordination of CSBG programs.

3. To ensure compliance with the CSBG Assurances and other related administrative and programmatic guidelines, DHCD established a Community Acting Planning System, which requires each CAA to develop a Community Action Plan. Each CAP includes a community needs assessment and a description of how linkages will be developed, coordinated and maintained to fill identified gaps in services. A description of how CSBG funding will be coordinated with other public/private resources to maximize the efficiency of programs and activities and a description of how the CAA will use the funds to support innovative community and neighborhood business initiatives.
4. DHCD will make every effort to identify other available state funding sources for the community services network.

## **XI. COMMUNITY FOOD AND NUTRITION APPLICATION**

### **1. Proposed CFNP Activities – Fiscal Year 2004**

During fiscal year 2004, the Department of Housing and Community Development (DHCD) received a \$77,759 CFNP grant from the U.S. Department of Health and Human Services, Administration for Children and Families, Office of Community Services.

Pursuant to Section 681 of the Coats Human Services Reauthorization Act of 1998, Public Law 105-285, also known as the Community Services Block Grant Act, funds awarded for fiscal year 2004 CFNP purposes shall be used to:

- a) coordinate private and public food assistance resources, whenever such coordination is determined to be inadequate, to better serve low-income individuals;
- b) assist low-income communities to identify potential sponsors of child nutrition programs and to initiate new programs in underserved or unserved areas; and,
- c) develop innovative approaches at the state and local levels to meet the nutrition needs of low-income individuals.

DHCD specifically shall seek responses from Community Action Agencies (CAAs) that will achieve the following criteria:

- A demonstration of a measurable impact (s) (e.g., decreased hunger, increased access to resources) on those served under the program.
- Agencies that have identified a recent occurrence in their designated service area that has had a negative impact on the local hunger network (e.g. the loss/reduction of an anti-hunger grant, closing of a food pantry, dramatic increase in emergency food requests).
- Agencies that are prepared to provide services for underserved populations (e.g., refugee populations, publication of multi-lingual guides, cultural appropriate foods, multi-lingual workshops).
- Agencies willing to work closely with their local Department of Transitional Assistance (DTA) office to increase food stamp outreach.

Fiscal Year 2004 CFNP awards will be announced in September 2005. The contract period will be October 1, 2004 to September 30, 2005.

## **Fiscal Year 2003**

The United States Department of Health and Human Services, Administration for Children and Families, Office of Community Services, allocated \$68,335 to the Commonwealth of Massachusetts for the Community Food and Nutrition (CFNP) purpose for fiscal year 2003. DHCD awarded the CFNP funds to selected community action agencies (CAAs) through a competitive grant application process.

DHCD sought responses from Community Action Agencies (CAAs) and CFNP awards were granted to CAAs that linked CFNP activities to an established program that lacked a nutrition education component. In addition, the selected CAAs demonstrated how the existing program, with the inclusion of the CFNP would be marketed to residents of its designated service area. Proposed outreach included but was not limited to, residents of public housing, and clients of other local community based organizations.

DHCD specifically sought responses from Community Action Agencies (CAAs) that achieved the following criteria:

- A demonstration of a measurable impact (s) (e.g., decreased hunger, increased access to resources) on those served under the program.
- Community Action Agencies (CAAs) that had identified a recent occurrence in their designated service area that has had a negative impact on the local hunger network (e.g., the loss/reduction of an anti-hunger grant, closing of a food pantry, dramatic increase in emergency food requests).
- Community Action Agencies (CAAs) that were prepared to provide services for underserved populations (e.g., refugee populations, the publication of multi-lingual guides, cultural appropriate foods, multi-lingual workshops).
- Community Action Agencies (CAAs) that identified hunger/nutrition as an issue in their designated service area in their (2003-2005) Community Action Plans.
- Community Action Agencies (CAAs) that have not received CFNP funds from during the past three (3) funding cycles.

The following CAAs received a CFNP grant in fiscal year 2003:

- ❖ Citizens for Citizens, Inc. (Fall River) - \$10,000
- ❖ Community Action, Inc. (Haverhill) - \$10,000
- ❖ Franklin Community Action Corporation (Greenfield) - \$10,000
- ❖ Montachusett Opportunity Council, Inc. (Fitchburg) - \$10,000
- ❖ Quincy Community Action Programs, Inc. (Quincy) - \$10,000
- ❖ South Middlesex Opportunity Council, Inc. (Framingham) - \$9,167
- ❖ Tri-City Community Action Program, Inc. (Malden) - \$9,168



The following list provides a brief description of the proposed use of CFNP grants in fiscal year 2003:

- Citizens for Citizens, Inc. (Fall River) received a \$10,000 grant to provide monthly bi-lingual food and nutrition workshops in conjunction with the University of Massachusetts Extension, Nutrition and Education Program. These workshops are being conducted in Fall River and Taunton and are providing attendees with the knowledge and skills necessary to plan for daily food needs, prepare nutritious low cost meals, to select and buy food economically and to effectively use food resources available to them. Citizens for Citizens (CFC) is assisting clients in completing applications for food stamps, when necessary. Clients are interviewed and assessed based on their individual and family needs. Clients also receive counseling on such issues as food stamps, food purchasing, budgeting and nutritious food preparation. They are also referred to other CFC and outside services as needed. 150 families will benefit from these services.
- Community Action, Inc. (Haverill) received \$10,000 in order to address the high level of hunger and improve the nutrition needs of 200 low income households in the seacoast area through: the monthly provision of supplemental food to designated area food pantries; education awareness of nutrition and disease via the encouragement of healthy foods and dissemination on informational sheets, posters and menus; increase food stamp enrollment via trainings; and improved access to materials and food stamp enrollment via internet access.
- Franklin Community Action Corporation (Greenfield) received \$10,000 to purchase and store more food, including perishables, than it has been able to in the past, in order to meet the increased demand for services in Franklin County and North Quabbin. In addition, nutrition education materials are made available to pantry users and nutrition education classes are provided on a quarterly basis. Outreach to Hispanic, Russian, and Romanian/Moldavian-speaking consumers is being increased due to translated written materials and the availability of culturally appropriate foods. Parenting education in meal planning and nutrition education is also provided. In total, 1,635 households will be served as a result of these funds.
- Montachusett Opportunity Council, Inc. (Fitchburg) received \$10,000 to increase Latino participant's knowledge of healthy culturally specific eating with specific reference to different ingredients, looking at how the ingredients promote a healthy diet and how locally available ingredients can substitute for traditional ingredients. The program also provides the opportunity for community residents to actively participate in the program through organizing the cooking demonstrations for other community residents. In total, 14 households will have increased access to nutritious food and information and education. Households assisted meet to organize cooking demonstrations, prepare native language recipes and develop native language nutrition educational materials.
- Quincy Community Action Programs, Inc. (Quincy) received \$10,000 to provide a variety of emergency and crisis intervention services including food, meals and other supportive assistance designed to alleviate the immediate, emergency needs of

families and individuals, as well as to help low income households maximize their limited income, leaving them resources to pay for other necessities. These services are offered in a comfortable supportive environment that preserves client dignity, reduces isolation and removes barriers to assistance. Clients are linked with other social services organizations and community resources to ensure their other needs, including health and mental health, are addressed. In total, 850 households are being assisted through Quincy Community Action Program's (QCAP) Emergency Food Center, Isolated Elders Outreach project, Asian Outreach Initiative, and Food Stamp Education project. In addition, throughout the length of the contract, QCAP has been evaluating the effectiveness and quality of its CFNP program with the use of client surveys.

- South Middlesex Opportunity Council, Inc. (Framingham) received \$9,167 to add an expanded nutritional component to its current elderly nutrition program. The focus of this program is to address the serious issue of elder malnutrition. South Middlesex Opportunity Council, Inc. (SMOC) is providing nutritional supplements or therapeutic meals to 30 homebound elders. As a result of funds received, these elders are anticipated to exhibit, by nutritional assessment, improved health. SMOC's FY'03 CFNP contract originally was designed to serve 20 homebound elders, however, at its mid-year report, the agency indicated that it increased its capacity to provide services to an additional 10 seniors in need.
- Tri-City Community Action Program, Inc. (Malden) received \$9,168 to coordinate with other local providers in conducting a survey of homeless children in order to better understand the nutritional needs of families living in hotels/motels and to develop a plan for meeting those needs. The program is focusing on 90 hotel/motel families. In addition, appropriate education materials and training are being developed for targeted families. A nutritionist is providing age-appropriate nutrition education and counseling to children and their parents living in hotels/motels, who participated in the nutrition survey. A report of best practices will be produced at the end of the contract year.

## **2. Certification of CFNP Fund Usage**

The Department of Housing and Community Development assures that all awarded funds support the intent of Section 681 of the Coats Human Services Reauthorization Act of 1998, Public Law 105-285, also known as the Community Services Block Grant Act. First, DHCD annually awards CFNP funds to selected Community Action Agencies (CAAs) through a competitive grant application.

During the review process, DHCD staff read all applications carefully. This review process includes a standard review form that analyzes the applicant's status concerning compliance with the Act. If an application is determined to be in violation of one or more aspects of the Act, it will be deemed ineligible. Secondly, regular review of progress reports and, when necessary, on site assessments assure compliance. If a CFNP contractor is determined to be in violation of the Act, a corrective action (s) will be issued by DHCD. If the issues are deemed serious, a process of contract termination will be initiated.

The Department of Housing and Community Development will assure that the program will be statewide in scope by considering the geographic location and service delivery capacity of applicants during the competitive bid process.

The issue of the A-133 Audit and the CFNP will be addressed by Section 678D of the CSBG Act and Office of Management and Budget (OMB) Circular A-122, as well as A-110 requirements that is addressed within the contract document that the Department enters into with each community action agency and other Community Services Block Grant (CSBG) Special Projects/Community Food and Nutrition recipients. It is only in accordance with these assurances that the Department allocates and authorizes the receipt and expenditure of CSBG funds to any eligible contractor. The Department also ensures compliance with OMB Circulars A-110 and A-112 through the provisions of the Budgets and Expenditures section of the Department's Contract (Scope of Services and Additional Terms and Conditions).

The Commonwealth will ensure that fiscal control and fund accounting procedures will be established as may be necessary to assure the proper disbursement of, and accounting for, federal funds paid to the Commonwealth under this subtitle, including procedures for monitoring the assistance provided under this subtitle and provide that at least every year the Commonwealth shall prepare in accordance with subsections (f), an audit of its expenditures of amounts received under this subtitle and amounts transferred to carry out the purposes of this subtitle; [subsection (f) requires that at least annually the Commonwealth when it receives \$100,000 or more (during the fiscal year) in all types of federal financial assistance must conduct an audit in accordance with the Single Audit Act, Public Law 98-502 (31 USC. 75 and OMB Circular A-128) {675 (c)(9)}. In addition, review of CFNP fiscal reports will assure funds are being used properly.

The Department of Housing and Community Development has also developed program progress reports that will enable the Commonwealth to closely monitor the progress of all CFNP grantees. The Department of Housing and Community Development will also forward annual financial status report (s) as well as a final narrative report (s) to the U.S. Department of Health and Human Services, Administration for Children and Families, Office of Community Services. These reports will be forwarded to the Federal Government in a timely manner.

## **XII. ADMINISTRATIVE CERTIFICATIONS**

**OCS will provide federal forms for compliance concerning: Environmental Tobacco Smoke; Lobbying, Debarment, Suspension, and Other Responsibility Matters; and Drug Free Workplan.**

### **Certification Regarding Environmental Tobacco Smoke**

In accordance with the Public Law 103-227, Part C. Environmental Tobacco Smoke, also known as the Pro-Children Act of 1994 (Act), the Department will require that smoking not be permitted in any portion of any indoor facility owned or leased or contracted for by an entity and used routinely or regularly for the provision of health, day care, education, or library services to children under the age of 18 if the services are funded by Federal programs either directly or through States or local governmental by Federal grant, contract, loan or loan guarantee.

### **Certification Regarding Lobbying**

No federal appropriated funds have been paid or will be paid by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement.

If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, the undersigned shall complete and submit Standard Form LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions.

The undersigned shall require that the language of this certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

This certification is a material representative of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by Section 1352, Title 31 U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

Statement for Loan Guarantees and Loan Insurance:

The undersigned states, to the best of his or her knowledge and belief, that:

If any funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of congress, or an employee of a Member of Congress in connection with this commitment providing for the United States to insure or guarantee a loan, the undersigned shall complete and submit Standard Form LLL "Disclosure Forms to Report Lobbying," in accordance with its instructions.

**Certification Regarding Debarment, Suspension, and Other Responsibility Matters Primary Covered Transactions**

The Commonwealth of Massachusetts, by signing and submitting this CSBG Annual Consolidated State Plan, certifies to the federal government that it agrees to comply with the assurances set out below:

- (a) The inability of a person to provide the certification required below will not necessarily result in denial of participation in the covered transaction. If necessary, the Commonwealth of Massachusetts shall submit an explanation of why it cannot provide the certification. The certification or explanation will be considered in connection with the US Department of Health and Human Services' determination whether to enter into the transaction. However, a failure of the Commonwealth of Massachusetts to furnish a certification or explanation shall disqualify such person from participation in the transaction.
- (b) The certification in this clause is a material representation of fact upon which reliance was placed when the US Department of Health and Human Services (HHS) determined that the Commonwealth of Massachusetts knowingly rendered an erroneous certification, in addition to other remedies available to federal government, HHS may terminate this transaction for cause or default.
- (c) The Commonwealth of Massachusetts shall provide immediate written notice to the US Department of Health and Human Services agency to whom this Plan is submitted if at any time the Commonwealth of Massachusetts learns that its certification was erroneous when submitted or has become erroneous by reason of changed circumstances.
- (d) The terms "covered transaction," "debarred," "suspended," "ineligible," "person," "primary covered transaction," "principal," "proposal," and "voluntarily excluded," as used in this clause, have the meanings set out in the Definitions and Coverage sections of the rules implementing Executive Order 12549: 45 CFR Part 76.
- (e) The Commonwealth of Massachusetts agrees by submitting this Plan that, should the proposed covered transaction be entered into, it shall not knowingly enter into any lower tier covered transaction with a person who is debarred, suspended, declared ineligible, or voluntarily excluded from participation in this covered transaction, unless authorized by the US Department of Health and Human Services.
- (f) The Commonwealth of Massachusetts further agrees by submitting this CSBG Annual Consolidated State Plan that it will include the clause titled "Certification Regarding Debarment, Suspension, Ineligibility and Voluntary Exclusion - Lower Tier Covered

Transactions," provided by the US Department of Health and Human Services, without modification, in all lower tier covered transactions and in all solicitations for lower tier covered transactions.

- (g) A participant in a covered transaction may rely upon a certification of a prospective participant in a lower tier covered transaction that it is not debarred, suspended, ineligible, or voluntarily excluded from the covered transaction, unless it knows that the certification is erroneous. A participant may decide the method and frequency by which it determines the eligibility of its principals. Each participant may, but is not required to, check the Non-procurement List (of excluded parties).
  - (h) Nothing contained in the foregoing shall be construed to require establishment of a system of records in order to render in good faith the certification required by this clause. The knowledge and information of a participant is not required to exceed that which is normally possessed by a prudent person in the ordinary course of business dealings.
  - (i) Except for transactions authorized under paragraph 6 of these instructions, if a participant in a covered transaction knowingly enters into a lower tier covered transaction with a person who is suspended, debarred, ineligible, or voluntarily excluded from participation in this transaction, in addition to other remedies available to the federal government, the US Department of Health and Human Services may terminate this transaction for cause or default.
- (1) The Commonwealth of Massachusetts certifies to the best of its knowledge and belief, that it and its principals:
- (a) are not presently debarred, suspended, proposed for debarment, declared ineligible, or voluntarily excluded from covered transactions by any federal department or agency;
  - (b) have not within a 3-year period preceding this Plan been convicted of or had a civil judgment rendered against them for commission of fraud or a criminal offense in connection with obtaining, attempting to obtain, or performing a public (federal, state or local) transaction or contract under public transaction; violation of federal or state antitrust statutes or commission of embezzlement, theft, forgery, bribery, falsification or destruction of records, making false statements, or receiving stolen property;
  - (c) are not presently indicted or otherwise criminally or civilly charged by a governmental entity (federal, state or local) with commission of any of the offenses enumerated in paragraph (1) (b) of this certification; and
  - (d) have not within a 3-year period preceding this Plan had one or more public transactions (federal, state or local) terminated for cause or default.

- (2) Where the Commonwealth of Massachusetts is unable to certify to any of the statements in this certification, the Commonwealth of Massachusetts shall attach an explanation to this Plan.

### **Drug-Free Workplace Act Certification**

The Commonwealth of Massachusetts, by submitting this CSBG Consolidated State Plan, is providing the certification set out below which requires, by regulations, the implementation of the Drug-Free Workplace Act of 1988, 45 CFR Par 76, Subpart F. The regulations, published in the May 25, 1990 Federal Register, require certification by grantees that they will maintain a drug-free workplace. The certification set out below is a material of fact upon which reliance will be placed when the Department of Health and Human Services (HHS) determines to award the grant. If it is later determined that the grantee knowingly rendered a false certification, or otherwise violates the requirement of the Drug-Free Workplace Act, HHS, in addition to any other remedies available to the federal government, may take action authorized under the Drug-Free Workplace Act. False certifications shall be grounds for suspension of payments, suspension or termination of grants, or government-wide suspension or debarment.

Workplaces under grants, for grantees other than individuals, need not be identified on the certification. If known, they may be identified in the grant application. If the grantee does not identify the workplaces at the time of application, or upon award, once workplaces are identified, the grantee must keep the identity of the workplace(s) on file in its office and make the information available for federal inspection. Failure to identify all known workplaces constitutes a violation of the grantee's drug-free workplace requirements.

Workplace identifications must include the actual address of buildings (or parts of buildings) or other sites where work under the grant takes place. Categorical descriptions may be used (e.g., all vehicles of a mass transit authority or state highway department while in operation, state employees in each local unemployment office, performers in concerts hall or radio studios).

If the workplace identified to the US Department of Health and Human Services changes during the performance of the grant, the grantee shall inform the agency of the change(s), if it previously identified the workplaces in questions (see above).

Definitions of terms in the Nonprocurement Suspension and Debarment common rule and Drug-Free Workplace common rule apply to this certification. Grantees' attention is called, in particular, to the following definitions from these rules:

"Controlled substance" means a controlled substance in Schedule I through V of the Controlled Substance Act (21 USC. 812) and as further defined by regulation (21 CFR 1308.11 through 1308.15).

"Conviction" means a finding of guilt (including a plea of nolo contendere) or imposition of sentence, or both, by any judicial body charged with the responsibility to determine violations of the federal or state criminal drug statutes;

"Criminal drug statute" means a Federal or non-federal or state criminal drug statute involving the manufacture, distribution, dispensing, use, or possession of any controlled substance;

"Employee" means the employee of a grantee directly engaged in the performance of work under a grant, including: (i) All "direct charge" employees; (ii) temporary personnel and consultants who are directly engaged in the performance of work under the grant and who are on the grantee's payroll. This definition does not include workers not on the payroll of the grantee (e.g., volunteers, even if used to meet a matching requirement; consultants or independent contractors not on the grantee's payroll; or employees of subrecipients of subcontractors in covered workplaces).

The Commonwealth of Massachusetts certifies that it will or will continue to provide a drug-free workplace by:

- (a) publishing a statement notifying employees that the unlawful manufacture, distribution, dispensation, possession, or use of a controlled substance is prohibited in the grantee's workplace and specifying that actions that will be taken against employees for violation of such prohibition;
- (b) establishing an on-going drug-free awareness program to inform grantees about:
  - (1) the dangers of drug abuse in the workplace;
  - (2) the state's policy for maintaining a drug-free workplace;
  - (3) any available drug counseling, rehabilitation, and employee assistance programs; and
  - (4) the penalties that may be imposed upon employees for drug abuse violations occurring in the workplace;
- (c) making it a requirement that employees to be engaged in the performance of the grant be given a copy of the statement required by subparagraph (a);
- (d) notifying the employee and grantee in the statement required by subparagraph (a) that, as a condition of employment under the grant, the employee will:
  - (1) abide by the terms of the statement; and
  - (2) notify the employer in writing of his or her conviction for a violation of a criminal drug statute occurring in the workplace no later than five (5) calendar days after such conviction;
- (e) notifying the agency in writing, within ten (10) calendar days after receiving notice under subparagraph (d)(2) from an employee or otherwise receiving actual notice of such conviction. Employers of convicted employees must provide notice, including position title, to every grant officer or other designee on whose grant activity the convicted employee was



working, unless the federal agency has designated a central point for the receipt of such notices. Notice shall include the identification number(s) of each affected grant;

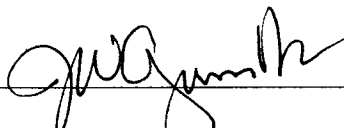
(f) taking one of the following actions within thirty (30) calendar days of receiving notice under subparagraph (d)(2), with respect to any employee who is convicted:

(1) taking appropriate personnel action against such an employee, up to and including termination, consistent with the requirements of the Rehabilitation Act of 1973, as amended; or

(2) requiring such employee to participate satisfactorily in a drug abuse assistance or rehabilitation program approved for such purposes by a federal, state, or local health, law enforcement, or other appropriate agency;

(g) making a good faith effort to continue to maintain a drug-free workplace through the implementation of paragraphs (a), (b), (c), (d), (e), and (f).

**Signature**

  
\_\_\_\_\_  
**Jane Wallis Gumble, Director,  
Department of Housing and Community Development**

August 31, 2004  
\_\_\_\_\_  
**Date**

\_\_\_\_\_  
**Grant Number**

### **XIII. ANNUAL REPORT**

A copy of the fiscal year 2003 CSBG Information System Survey Report was submitted to the National Association for State Community Services Programs (NASCSPP) within the established deadline of March 31, 2004 for purpose of reporting to the U.S. Dept. of Health and Human Services. Reports for the upcoming fiscal years will be submitted within the deadline as well.

Each year, DHCD also publishes a CSBG Performance Report highlighting information presented in the Information System Survey. The report typically includes:

- DHCD's organizational and program profiles.
- A report on the implementation of Results Oriented Management and Accountability (ROMA) in Massachusetts, including training and technical assistance initiatives.
- Quantitative analyses of clients served in Massachusetts including the total number of clients served statewide, breakout of number of clients served by service category, and demographic characteristics of clients such as, gender, age, race, education, family structure, income sources, income level, and housing status.
- A report on the National Goals and Outcome Measures and DHCD outcomes.
- An anecdotal evidence of clients achieving self-sufficiency and innovative programs.
- CAA coordination of CSBG funding from other federal and non-federal sources.
- An accounting of funds received through CSBG and other federal and non-federal sources.

#### **XIV. ATTACHMENTS**

- ◆ State Legislation - The Massachusetts Economic Opportunity Act of 1984
- ◆ 760 CMR 29.00 DHCD/CSBG Regulations
- ◆ Department of Housing and Community Development - Organizational Structure
- ◆ CAA Directory
- ◆ Notice of DHCD FY 2005 CSBG Public Hearing
- ◆ FY 2004 Community Food and Nutrition Program Grant Application
- ◆ CSBG Performance Measure Report